

Recommended Nonattainment Boundaries in Illinois for the PM_{2.5} National Ambient Air Quality Standard

Introduction

In July 1997, the U.S. Environmental Protection Agency (U.S. EPA) revised the National Ambient Air Quality Standard (NAAQS) for particulate matter by establishing a new standard for airborne particles smaller than 2.5 microns in aerodynamic diameter. In this action, U.S. EPA established two forms of the PM_{2.5} standard: an annual standard set at a level of 15 micrograms per cubic meter, and a 24-hour standard set at a level of 65 micrograms per cubic meter. In the same action, U.S. EPA also retained the existing PM₁₀ standards. Following promulgation of a new or revised air quality standard, the Clean Air Act (CAA) requires the Governor to recommend initial designations of the attainment status for all areas in the State. Areas can be classified as *nonattainment* (does not meet, or contributes to a nearby area that does not meet the NAAQS), *attainment* (meets the NAAQS), or *unclassifiable* (cannot be classified based on available data). Illinois is, therefore, providing recommendations for attainment/nonattainment area boundaries for the PM_{2.5} standard. The U.S. EPA will act on the State's recommendations by affirming and promulgating the recommended designation boundaries, or by promulgating new designation boundaries.

This report provides the basis for recommendations by the Illinois Environmental Protection Agency (IEPA) for attainment/nonattainment designation boundaries for all areas in the State of Illinois for the PM_{2.5} standard. Based on an analysis of air quality, emissions, land use, and population trends, the IEPA recommends that portions of the Chicago and Metro-East metropolitan areas be designated as nonattainment for the PM_{2.5} standard. Except for Jersey County, the boundaries of the PM_{2.5} nonattainment areas recommended here for the Chicago and Metro-East metropolitan areas match the boundaries of the proposed 8-hour ozone nonattainment areas (see Figure 1). With the exception of Jersey and Randolph counties, the remaining areas of Illinois should be classified as attainment areas for the PM_{2.5} standard.

IEPA recommends that Jersey County, which is located in the Metro-East area in southwestern Illinois, be designated as unclassifiable for the PM_{2.5} standards. The IEPA has recently installed a PM_{2.5} ambient monitor in this county. Jersey County should be designated as unclassifiable until IEPA has collected sufficient ambient air monitoring data to clarify its attainment status. Randolph County, which is also located in the Metro-East area, is the location of the Baldwin power plant, a large source of PM_{2.5} precursor emissions. The Baldwin plant may be subject, in the near future, to significant new emission reduction requirements as a result of litigation and expected State and Federal regulatory initiatives. Since the plant will be required to substantially reduce emissions regardless of the area's PM_{2.5} designation, IEPA recommends that Baldwin Township, where the Baldwin plant is located, be designated as unclassifiable for the PM_{2.5} standards. If the anticipated emission reduction requirements are substantially delayed, the IEPA may seek to designate Baldwin Township in Randolph County as a nonattainment area in the future.

Federal Guidance

IEPA has relied on a U.S. EPA's memorandum, "Designation of the Fine Particle National Ambient Air Quality Standards" (April 1, 2003), for developing this recommendation for designating geographic boundaries for nonattainment areas for the PM_{2.5} standard in Illinois. In this memorandum, U.S. EPA recommends that areas with air quality data showing violations of the PM_{2.5} NAAQS, and nearby areas that cause or contribute to NAAQS violations, be designated nonattainment. Consistent with the requirements for 8-hour nonattainment areas, U.S. EPA's presumption favors PM_{2.5} nonattainment boundaries that reflect the Metropolitan Statistical Area (MSA) or the Consolidated Metropolitan Statistical Area (CMSA) as defined by the U.S. Census Bureau. A list of the counties in Illinois comprising the Chicago CMSA and the St. Louis MSA is included as Table 1.

States may request that the boundaries of a nonattainment area be expanded beyond the MSA or CMSA to include additional counties when those counties contain sources, population, commuting patterns or other factors that may contribute to the nonattainment problem. States may also request nonattainment area boundaries that are smaller than the CMSA or MSA where counties, or portions

**TABLE 1
COUNTIES INCLUDED IN THE
CHICAGO CMSA AND ST. LOUIS MSA***

<u>Chicago-Gary-Kenosha (IL-IN-WI) CMSA</u>	<u>St. Louis, MO-IL MSA</u>
Cook County, IL	Clinton County, IL
DeKalb County, IL	Jersey County, IL
DuPage County, IL	Madison County, IL
Grundy County, IL	Monroe County, IL
Kane County, IL	St. Clair County, IL
Kankakee County, IL	Crawford County (Sullivan City), MO
Kendall County, IL	Franklin County, MO
Lake County, IL	Jefferson County, MO
McHenry County, IL	Lincoln County, MO
Will County, IL	St. Charles County, MO
Lake County, IN	St. Louis County, MO
Porter County, IN	Warren County, MO
Kenosha County, WI	St. Louis City, MO

*Metropolitan areas defined by Office of Management and Budget in 1998 – Source: U.S. Census Bureau

of counties, are considered to be rural. Factors to be considered in assessing whether to include areas outside of or exclude portions within a metropolitan area include: air quality, emissions in areas potentially included versus excluded from the nonattainment area, population density and degree of urbanization, traffic and commuting patterns, expected growth, and the boundaries used for implementation of the 8-hour ozone standard. The IEPA has considered these and other factors in preparing these recommendations.

U.S. EPA’s guidance also mentions weather and transport patterns, and geography/topography as factors to consider for establishing nonattainment boundaries. As discussed in the following section, the PM_{2.5} standard of concern is the annual standard. Since all weather patterns contribute to the average concentration over the course of a year, it is difficult to use meteorological factors as a means of excluding or including counties within the nonattainment areas for Chicago or the Metro-East. Further, there are no dominant geographic or topographic features that distinguish or separate one county from another in either the Chicago or Metro-East areas. Consequently, IEPA has not considered these factors in preparing these recommendations.

Current Air Quality

The PM_{2.5} design values derived from measurements collected from IEPA's ambient air monitoring network from the most recent 3-year period of record (2000-2002) are summarized in Table 2 and Figures 2 and 3. For comparison to the annual PM_{2.5} NAAQS, the annual design value for a given monitoring location is the 3-year arithmetic mean of the measured annual average concentrations. The 24-hour design value for a given monitor is the 3-year average of each year's 98th-percentile daily PM_{2.5} concentration. There have been no violations of the 24-hour standard anywhere in the State of Illinois since monitoring for this pollutant was initiated in 1999. Violations of the annual PM_{2.5} standard have been measured, however, in both the Chicago and Metro-East metropolitan areas. In the Chicago area, measured design values from the 2000-2002 period exceed the NAAQS at several monitoring stations located in Cook, DuPage, and Will counties. In the Metro-East area, design values exceeding the NAAQS have been measured in Madison and St. Clair counties during this 3-year period. Air quality data collected in Illinois, therefore, indicate that it is appropriate to designate at least portions of the Chicago and Metro-East metropolitan areas as nonattainment for the PM_{2.5} standard. All other areas in Illinois are attaining the annual PM_{2.5} standard, and should be designated attainment for the PM_{2.5} standard.

Figures 4 and 5 depict annual PM_{2.5} design values for 2000-2002 in the Lake Michigan and St. Louis areas, respectively. In the Lake Michigan region, PM_{2.5} design values exceeded the annual NAAQS in 2000-2002 in Indiana and Michigan. In Missouri, violations of the annual PM_{2.5} NAAQS have been measured only within the City of St. Louis during 2000-2002. In both the Lake Michigan and metropolitan St. Louis areas, annual PM_{2.5} design values are higher in Illinois than in neighboring states.

Precursor Emissions

U.S. EPA recommends that proposed nonattainment designations for the PM_{2.5} NAAQS reflect not only the areas of measured violations, but also the nearby areas that contribute to measured

**TABLE 2
ILLINOIS PM_{2.5} DESIGN VALUES FOR 2000-2002**

Monitoring Site	24-Hour 98th Percentile Values			24-Hour Design Values	Annual Mean Values			Annual Design Values
	2000	2001	2002	00-02	2000	2001	2002	00-02
Quincy	29.5	28.2	27.0	28.2	13.1	12.3	13.7	13.0
Champaign	27.8	29.3	23.4	26.8	14.8	12.6	12.2	13.2
Bondville ¹	27.8	23.3	23.2	24.8	14.5	11.9	12.2	12.9
Chicago-Farr ¹	32.5	41.9	37.2	37.2	15.9	17.1	15.5	16.2
Chicago-Washington	37.0	39.9	35.7	37.5	17.9	17.1	15.3	16.8
Chicago-SE Police ¹	39.8	41.2	36.6	39.2	16.5	18.1	15.5	16.7
Chicago-Mayfair	43.2	44.4	39.3	42.3	18.3	19.4	16.5	18.1
Chicago-Springfield	35.7	38.8	34.1	36.2	17.3	16.2	15.2	16.3
Chicago-Com Ed ¹	33.7	37.4	36.0	35.7	16.6	16.5	15.7	16.3
McCook*	47.5	38.1	41.4	42.3	-	-	-	-
Blue Island	32.8	38.2	36.2	35.7	16.8	17.1	15.2	16.4
Summit	36.4	35.8	37.3	36.5	16.9	16.5	16.1	16.5
Des Plaines**	-	34.4	34.9	34.7	-	14.8	14.4	14.6
Northbrook	35.1	38.4	32.8	35.4	14.3	14.7	13.2	14.1
Cicero ¹	34.4	38.9	37.2	36.8	16.5	17.4	16.0	16.6
Naperville	34.1	36.8	34.4	35.1	15.3	15.5	14.7	15.2
Elgin ¹	34.8	33.6	35.3	34.6	14.5	15.1	14.3	14.6
Zion ¹	31.3	33.8	32.7	32.6	12.2	13.8	13.5	13.1
Oglesby*	34.8	28.9	31.1	31.6	-	-	-	-
Cary	34.8	33.3	33.1	33.7	14.8	13.7	12.3	13.6
Normal	32.5	32.4	25.7	30.2	14.9	14.8	12.9	14.2
Decatur	30.9	34.7	33.9	33.2	15.0	14.3	14.1	14.5
Granite City-VFW*	37.4	42.9	44.6	41.6	-	-	-	-
Granite City-23rd	33.5	35.0	42.9	37.1	17.4	17.3	17.7	17.5
Alton	36.3	39.6	34.5	36.8	16.0	15.8	14.7	15.5
Wood River	32.1	33.9	33.9	33.3	15.9	15.0	15.1	15.3
Peoria	32.2	36.4	33.6	34.1	14.9	13.9	13.9	14.2
Houston	32.6	26.6	25.7	28.3	15.2	12.1	11.6	12.9
Rock Island**	-	30.4	24.7	27.6	-	12.8	11.8	12.3
E. St. Louis	36.1	33.7	40.9	36.9	17.4	17.0	16.7	17.0
Swansea	32.8	39.3	37.2	36.4	15.0	15.5	15.1	15.2
Springfield	32.2	33.3	31.5	32.3	13.4	13.3	13.6	13.4
Joliet	30.8	40.1	33.7	34.9	16.0	16.1	14.4	15.5
Braidwood	28.6	26.1	32.0	28.9	14.2	12.9	13.5	13.5
Rockford ¹	36.2	42.6	32.6	37.1	15.0	14.0	14.8	14.6

* - Annual PM_{2.5} Standard does not apply at these monitoring sites

** - These sites have less than three years of data

¹ - These sites have incomplete data based on Illinois EPA's criteria

violations. Figures 6a through 6e, and the accompanying tables, summarize actual emissions from point, area and mobile sources in the Chicago metropolitan area for the following pollutants: sulfur dioxide (SO₂), oxides of nitrogen (NO_x), volatile organic compounds (VOC), fine particulate matter (PM_{2.5}), and ammonia (NH₃), based on U.S. EPA's National Emissions Inventory (NEI) for 1999. Figures 7a through 7e provide similar information for the Metro-East area, including Randolph County. Note that the Randolph County point source emissions for SO₂ and NO_x reflect 2002 reported emissions to account for dramatic emissions reductions that have occurred at the Baldwin power plant since 1999.

For the Chicago CMSA (Figures 6a-6e):

- SO₂ emissions are highest in Will, Cook, and Lake counties, and lowest in Kankakee, DeKalb, and Kendall counties.
- NO_x emissions are highest in Cook County. NO_x emissions in Will, DuPage, and Lake counties are also relatively large. Kankakee, Kendall, McHenry, and DeKalb counties have relatively low emissions.
- VOC emissions are highest in Cook County. DuPage, and Lake counties also have relatively large VOC emissions. VOC emissions are lowest in DeKalb, Grundy, and Kendall counties.
- PM_{2.5} emissions are highest in Cook County. PM_{2.5} emissions are relatively high in Will, Lake, and DuPage counties. PM_{2.5} emissions are lowest in Kankakee, DeKalb, Grundy, and Kendall counties.
- NH₃ emissions are highest in Cook County. Grundy, DeKalb, and Will counties also have relatively high emissions of NH₃. Lake and Kendall counties have the lowest NH₃ emissions.

For the Metro-East MSA, including Randolph County (Figures 7a-7e):

- SO₂ emissions are highest in Madison and Randolph counties, and lowest in Clinton, Jersey, and Monroe counties.
- NO_x emissions are highest in Madison and Randolph counties. NO_x emissions in St. Clair County are also relatively high. Clinton, Monroe, and Jersey counties have relatively low emissions.

- VOC emissions are highest in Madison and St. Clair counties, and lowest in Monroe and Jersey counties.
- PM2.5 emissions are highest in Madison, St. Clair, and Randolph counties, and lowest in Clinton, Monroe, and Jersey counties.
- NH3 emissions are highest in Madison and Clinton counties. Randolph and St. Clair counties also have relatively high emissions of NH3. Jersey County has the lowest NH3 emissions.

Figures 8a through 8e depict both the locations and emission rates of point sources in the Chicago metropolitan area for the following pollutants: sulfur dioxide (SO₂), oxides of nitrogen (NO_x), volatile organic compounds (VOC), fine particulate matter (PM_{2.5}), and ammonia (NH₃), based on U.S. EPA's National Emissions Inventory (NEI) for 1999. The shaded areas in the figures represent the areas being recommended as nonattainment for the PM_{2.5} NAAQS. Figures 9a through 9e provide similar information for the Metro-East area.

For the Chicago CMSA (Figures 8a-8e):

- The largest point sources for SO₂ are located in Will County. Cook and Lake counties also contain some point sources with high SO₂ emission rates. Cook County has the largest number of SO₂ emitting point sources. McHenry, Kane, DeKalb, Kendall, Grundy, and Kankakee counties have relatively few point sources emitting SO₂.
- The largest point sources for NO_x are located in Will County. Cook and Lake counties also contain some point sources with high NO_x emission rates. Cook County has the greatest number of NO_x emitting point sources. DeKalb, Kendall, Grundy, and Kankakee counties have relatively few point sources emitting NO_x.
- Both the largest size and greatest number of VOC point sources occur in Cook County. DuPage, Kane, Will and Kankakee counties also contain significant point sources of VOC. DeKalb, Grundy, and Kendall counties have relatively few VOC point sources.
- The largest emitting and greatest number of PM_{2.5} point sources are located in Cook County. There are numerous, but relatively small PM_{2.5} point sources located in Will, Lake, and DuPage counties. There are relatively few PM_{2.5} point sources in McHenry, Kane, DeKalb, Kendall, Grundy, and Kankakee counties.

- There are few point sources emitting NH₃ in the Chicago CMSA based on U.S. EPA's 1999 NEI inventory. One large point source is located in Grundy County, and two smaller NH₃ sources are located in Will County.

For the Metro-East MSA, including Randolph County (Figures 9a-9e):

- The largest point sources for SO₂ are located in Madison and Randolph counties. Madison and St. Clair counties have the largest number of SO₂ emitting point sources. Jersey, Clinton, and Monroe counties have relatively few point sources emitting SO₂.
- The largest point sources for NO_x are located in Madison and Randolph counties. Madison and St. Clair counties have the largest number of NO_x emitting point sources. Jersey, Clinton, and Monroe counties have relatively few point sources emitting NO_x.
- The largest emitting and greatest number of point sources emitting VOC's are located in Madison and St. Clair counties. Jersey, Clinton, Monroe, and Randolph counties have relatively few point sources emitting VOC's.
- The largest point sources for PM_{2.5} are located in Madison and Randolph counties. Madison and St. Clair counties have the largest number of PM_{2.5} emitting point sources. Jersey, Clinton, and Monroe counties have relatively few point sources emitting PM_{2.5}.
- Madison County contains the only significant point sources of NH₃ based on U.S. EPA's 1999 NEI inventory.

Urbanization, Population and Employment Trends

Table 3 lists the population of each of the counties contained in the Chicago CMSA and Metro-East St. Louis MSA, as well as land areas, and population densities based on U.S. Census Bureau estimates for 2000. Figures 10 and 11 graphically depict population densities in the Chicago CMSA and the Metro-East MSA, respectively. For the Chicago area, these data show that Cook, DuPage, Lake, and Will Counties have both the highest population and population densities, while Grundy, DeKalb, Kendall, and Kankakee Counties have the lowest. St. Clair and Madison Counties contain the majority of the total Metro-East population, while Jersey, Monroe, Randolph, and Clinton Counties are considerably less populated.

TABLE 3
POPULATION ESTIMATES BY COUNTY

Chicago CMSA
(Illinois Counties Only)

<u>County</u>	<u>2000 Population</u>	<u>Land Area (Sq. Miles)</u>	<u>Population Density (Persons per sq. mile)</u>
Cook	5,376,741	945.68	5,685
DuPage	904,161	333.61	2,710
Lake	644,356	447.56	1,440
Will	502,266	836.94	600
Kane	404,119	520.44	777
McHenry	260,077	603.51	431
Kankakee	103,833	676.75	153
DeKalb	88,969	634.16	140
Kendall	54,544	320.58	170
Grundy	37,535	419.90	89

Metro-East-St. Louis MSA
(Illinois Counties Only)

<u>County</u>	<u>2000 Population</u>	<u>Land Area (Sq. Miles)</u>	<u>Population Density (Persons per sq. mile)</u>
Madison	258,941	725.02	357
St. Clair	256,082	663.81	386
Clinton	35,535	474.23	74
Randolph	33,893	578.42	58
Monroe	27,619	388.29	71
Jersey	21,668	369.16	58

Figures 12 and 13 depict current land cover for both the Chicago and Metro-East areas based on data compiled by the Illinois Department of Natural Resources. In the Chicago area, the most urbanized counties are clearly Cook and DuPage Counties, although Lake, Will and Kane Counties also contain significant urbanized areas. Madison and St. Clair Counties are the most urbanized of the counties in the Metro-East area. In each of the Illinois counties of DeKalb, Kankakee, Kendall, Grundy, Jersey, and Clinton, the predominant land cover is agricultural and cropland, and in each county the amount of urban and built-up land is small (less than 5%). The dominance of agricultural land use, coupled with the low population densities in these counties, confirm that they are primarily rural in nature.

Population and economic trends are developed for long range planning activities by both State and local governmental agencies. Data compiled by the U.S. Census State Data Center were referenced for this analysis and are shown in Figure 14. In the Chicago CMSA, the highest total population growth is projected to occur in Cook and Will Counties. The lowest growth is projected for DeKalb, Grundy, Kendall, and Kankakee Counties. In the Metro-East area, population growth is highest in St. Clair and Madison counties, and lowest in Randolph, Monroe, Jersey and Clinton Counties.

Employment growth projections, which were compiled from projections developed by the Illinois Department of Employment Security, are shown in Figure 15. In the Chicago area, the highest rate of employment growth is expected to occur in Cook, Lake, and DuPage counties, while the lowest rates of employment growth are expected in DeKalb, Kendall, and Grundy counties. In the Metro-East area, moderate employment growth is forecast for Madison, and St. Clair counties. Relatively low employment growth is expected in Monroe, Clinton, Jersey, and Randolph counties.

Traffic Characteristics

The Illinois Department of Transportation (IDOT) publishes an annual report entitled "Illinois Travel Statistics". This report provides detailed information regarding vehicular traffic for each county in Illinois. Table 4 summarizes IDOT's estimates of Average Daily Vehicle Miles Traveled (ADVMT) in 2001 as calculated by IDOT's Highway Information System. ADVMT on a segment of road is calculated by multiplying the length of the road (in miles) by the estimated average daily traffic on

Table 4
Illinois Travel Statistics 2001

Chicago Consolidated Metropolitan Statistical Area (CMSA)	Average Daily Vehicle Miles Traveled (ADVMT)
Cook	90,662,920
DuPage	22,457,672
Lake	15,437,959
Will	11,804,005
Kane	8,045,872
McHenry	5,490,420
Kankakee	2,474,810
DeKalb	2,019,848
Grundy	1,723,265
Kendall	1,506,392

St. Louis Metropolitan Statistical Area (MSA)	Average Daily Vehicle Miles Traveled (ADVMT)
Madison	7,433,221
St. Clair	7,097,561
Clinton	1,049,143
Monroe	912,099
Randolph	754,847
Jersey	550,050

the road. In the Chicago area, Cook, DuPage, Lake, and Will counties have the highest ADVMT. In fact, the ADVMT in these four counties account for approximately 87% of the total for the Illinois portion of the CMSA. Collectively, Kankakee, DeKalb, Grundy, and Kendall counties account for about 5% of the total ADVMT in the CMSA. In the Metro-East MSA, Madison and St. Clair counties have the highest ADVMT, accounting for about 81% of the ADVMT in the Illinois portion of the MSA. Randolph and Jersey counties have the lowest ADVMT, about 8% of the total for the MSA.

The U. S. Census Bureau has compiled statistics from the 2000 census that quantify commuting patterns in the Chicago and Metro-East metropolitan areas. Figures 16 and 17 illustrate where people reside and the counties where they journey to work. Each county is color-coded on the histograms. For example, Cook County is shown in Figure 16 as a yellow bar in each county's histogram. The data show that 2.07 million people reside in Cook County and commute within Cook County to reach their place of employment, but only 826 people reside in Cook County and commute to DeKalb County for employment. From Figure 16, it is evident that more commuters in the Chicago CMSA travel to places of employment in the same county where they reside than travel to other counties. Not all commuters reside in the counties where they are employed, however. In some counties, a significant percentage of commuters travel to places of employment in other counties. For example, 152,433 residents of DuPage County commute to Cook County for employment. Similarly, a large percentage of commuters residing in Kendall County travel to DuPage and Kane counties for employment, although the number of commuters residing in Kendall County is small relative to the number of commuters in the CMSA. Commuting patterns in the Metro-East area (see Figure 17) are similar in that more commuters travel to places of employment in the same county where they reside than travel to other counties.

Recommended Nonattainment Area Boundaries for the 8-hour Ozone Standard

U.S. EPA's guidance (April 2003) recognizes that there is significant overlap in the precursors of PM_{2.5} and the precursors of ozone, and therefore suggests that states consider aligning the boundaries of PM_{2.5} and ozone nonattainment areas. The IEPA submitted recommended nonattainment area boundaries (see Figure 1) for the 8-hour ozone NAAQS on July 16, 2003. U.S. EPA has not yet promulgated final designations for Illinois, but has indicated its concurrence with IEPA's recommendations.

The IEPA recommended that the following counties, or portions thereof, be designated as nonattainment for the 8-hour ozone standard:

<u>Chicago NAA</u>	<u>Metro-East NAA</u>
Cook County	Jersey County
DuPage County	Madison County
Grundy County	Monroe County
(Aux Sable and Goose Lake Townships)	St. Clair County
Kane County	
Kendall County	
(Oswego Township)	
Lake County	
McHenry County	
Will County	

As will be discussed in the following section, with the exception of Jersey and Randolph counties, IEPA is recommending boundaries for PM2.5 nonattainment areas that match the above-listed boundaries recommended as 8-hour ozone nonattainment areas.

RECOMMENDATIONS

The CAA does not specify the geographic boundaries, size, or the extent to which source contributions would require that an area be designated as nonattainment for the PM2.5 standard nor has U.S. EPA promulgated rules prescribing such. IEPA's recommendations are consistent with guidance provided by U.S. EPA (April 2003), and are based on an evaluation of present and projected air quality, the distribution of precursor emissions, and other demographic factors. The IEPA recognizes that each of the factors considered in this evaluation are not necessarily conclusive when evaluated individually. Rather, IEPA's recommendations are based on consideration of all of the data and projections taken together.

IEPA's recommendations for attainment/nonattainment designations in Illinois for the PM2.5 ambient air quality standards are contained in Table 5. Current air quality data collected by the IEPA indicate that the only areas of Illinois where the PM2.5 air quality standard is not being met are in portions of the Chicago and Metro-East metropolitan areas. Nonattainment designations for at least

portions of these metropolitan areas are, therefore, warranted. The IEPA's recommendation for inclusion of counties within the boundaries of the nonattainment areas are discussed in the following section.

Chicago PM2.5 Nonattainment Area

Cook County. Current air quality data (2000-2002) at several monitoring locations in Cook County do not meet the PM2.5 annual standard. Cook County is currently designated nonattainment for the 1-hour standard, and the IEPA has recommended that it be designated as an 8-hour ozone nonattainment area, also. Cook County has high levels of precursor emissions, generally the highest emissions of any of the ten counties in the CMSA. Demographically, Cook County has the highest population, the highest population density, the largest acreage of urban land cover, and the highest levels of vehicular traffic of all the counties in the CMSA. Cook County should be included in the Chicago nonattainment area for the PM2.5 standard.

Lake County. Lake County is currently designated nonattainment for the 1-hour standard, and has been recommended as an 8-hour ozone nonattainment area by the IEPA. Lake County has high levels of precursor emissions, relatively high total population and population density, large amounts of acreage with urban land cover, and high levels of vehicular traffic. The IEPA, therefore, recommends that Lake County be included in the Chicago nonattainment area for the PM2.5 standard.

DuPage and Will Counties. Both DuPage and Will Counties are currently designated nonattainment for the 1-hour standard, and have been recommended for inclusion in the 8-hour ozone nonattainment area by the IEPA. Air quality at monitoring stations in both counties exceed the annual PM2.5 air quality standard. DuPage and Will Counties have high levels of precursor emissions. DuPage County is second only to Cook County in total population, population density, vehicular traffic, and total urban land cover. Similarly, Will County has a relatively high population, population density, population growth, traffic level, and urban land coverage. The IEPA, therefore, recommends that DuPage and Will Counties be included in the Chicago nonattainment area for the PM2.5 standard.

Table 5
Recommended Attainment/Nonattainment Designations in Illinois
For the PM_{2.5} Ambient Air Quality Standard

<u>County</u>	<u>Designation</u>	<u>Name of Area</u>
Cook	Nonattainment	Chicago
DuPage	Nonattainment	Chicago
Kane	Nonattainment	Chicago
Lake	Nonattainment	Chicago
Will	Nonattainment	Chicago
McHenry	Nonattainment	Chicago
Kendall:		
Oswego Township	Nonattainment	Chicago
All Other Townships	Attainment	
Grundy:		
Aux Sable Township	Nonattainment	Chicago
Goose Lake Township	Nonattainment	Chicago
All Other Townships	Attainment	
Madison	Nonattainment	Metro-East
Monroe	Nonattainment	Metro-East
St. Clair	Nonattainment	Metro-East
Randolph:		
Baldwin Township	Unclassifiable	Randolph
All Other Townships	Attainment	
Jersey	Unclassifiable	Jersey
All Other Counties	Attainment	

McHenry and Kane Counties. McHenry and Kane Counties are on the western fringe of the metropolitan area with the eastern portions of these counties having an urban/suburban character, while the western portions are basically rural. These counties have moderate levels of precursor emissions relative to Cook, Lake, DuPage, and Will Counties, and the total population, population density, and total urban land cover in these counties are also relatively moderate. McHenry and Kane Counties are experiencing moderate population and employment growth. Both McHenry and Kane Counties are currently designated nonattainment for the 1-hour standard, and have been recommended for inclusion in the 8-hour ozone nonattainment area by the IEPA. The IEPA, therefore, recommends that McHenry and Kane Counties be included in the Chicago nonattainment area for the PM2.5 standard.

Grundy and Kendall Counties. Due to their primarily rural character, most of Grundy and Kendall Counties were not included in the Chicago 1-hour nonattainment area, and were not recommended for inclusion in the Chicago 8-hour ozone nonattainment area by the IEPA. Certain townships in Grundy and Kendall Counties were included in the 1-hour nonattainment area, the boundaries of which were established subsequent to the 1990 Amendments to the CAA, due to the significance of certain stationary, or point, sources as indicated by the IEPA's 1990 emissions inventory. Precursor emission levels in the remaining portions of these counties are low, as is the total population, population density, traffic volumes, and total urban land cover. For these reasons, the IEPA recommends that Oswego Township in Kendall County and Goose Lake and Aux Sable Townships in Grundy County be included in the Chicago nonattainment area for the NAAQS for PM2.5, but that the remainder of these two counties should retain their current designation as attainment.

DeKalb and Kankakee Counties. The U.S. Census Bureau added DeKalb and Kankakee counties to the Chicago CMSA in 1998. They were not included in the Chicago nonattainment area for the 1-hour ozone standard, and were not recommended for inclusion in the Chicago 8-hour ozone nonattainment area by the IEPA. These counties are primarily rural, as shown by their low 2000 population totals and population densities, and the small amount of urban land cover in each county is not contiguous with the Chicago urbanized area. Current precursor emission levels in these counties are also low, compared to the other counties in the CMSA. For these reasons, the IEPA recommends

that DeKalb and Kankakee Counties not be included in the nonattainment area and that they be designated as attainment for the NAAQS for PM2.5.

Metro-East PM2.5 Nonattainment Area

Madison County. Madison County is currently designated as a maintenance area for the 1-hour standard, and has been recommended for inclusion in the 8-hour ozone nonattainment area by the IEPA. In terms of precursor emissions, Madison County has the highest levels of both VOC and NOx emissions of any of the counties in the Metro-East area. Demographically, Madison County has the highest population, the second highest population density, and the largest acreage of urban land cover of all the counties in the Metro-East. Madison County should be included in the Metro-East nonattainment area for the PM2.5 standard.

St. Clair County. Air quality data from the most recent 3-year period (2000-2002) indicate that St. Clair County does not meet the PM2.5 standard. It is currently designated as a maintenance area for the 1-hour ozone standard, and has been recommended for inclusion in the 8-hour ozone nonattainment area by the IEPA. St. Clair County has relatively high levels of both VOC and NOx emissions, relatively high total population and population density, and large amounts of acreage with urban land cover. St. Clair County is also expected to experience relatively high population and employment growth in future years. The IEPA, therefore, recommends that St. Clair County be included in the Metro-East nonattainment area for the PM2.5 standard.

Monroe County. Monroe County is on the southern fringe of the Metro-East area with the northern portions of the county having an urban/suburban character, while the southern and eastern portions of the county are basically rural. It is currently designated as a maintenance area for the 1-hour standard, and has been recommended for inclusion in the 8-hour ozone nonattainment area by the IEPA. This county has relatively low levels of precursor emissions relative to Madison and St. Clair Counties, and the total population, population density, and total urban land cover is also relatively low. Because of its current designation as a 1-hour maintenance area, the IEPA recommends that Monroe County be included in the Metro-East nonattainment area for the PM2.5 standard.

Jersey County. Jersey County is a rural county located to the north of St. Louis, and is currently designated as a maintenance area for the 1-hour standard. IEPA recommended that it be designated as an 8-hour ozone nonattainment area, not because of emissions levels, growth, or adverse air quality impacts in nearby areas, but because violations of the 8-hour ozone standard have been measured in this county. Jersey County has low levels of precursor emissions, low population and population density, low urban land cover, and low population and employment growth rates. To determine PM_{2.5} air quality levels in Jersey County, IEPA installed a PM_{2.5} monitoring station in Jerseyville. As the site was installed in January 2004, there are not sufficient data at this time to determine the attainment status of this county. For this reason, the IEPA recommends that Jersey County be designated as unclassifiable until sufficient monitoring data are available.

Clinton County. As mentioned previously, the current (1998) MSA boundaries established by the U.S. Census Bureau for St. Louis include Clinton County, Illinois. Clinton County is not contained within the existing 1-hour maintenance area. This county is primarily rural, with low 2000 population totals and population densities, and small amounts of urban land cover, compared to other counties in the MSA. Current precursor emission levels in Clinton County are low, as are expected rates of population and employment growth. For these reasons, the IEPA recommends that Clinton County be designated as attainment for the NAAQS for PM_{2.5}.

Randolph County. Randolph County is not part of the Metro-East/St. Louis MSA as defined by the U.S. Census Bureau, and was not recommended for inclusion in the 8-hour ozone nonattainment area. This rural county has low population and population density, low urban land cover, and low population and employment growth rates. Randolph County has high levels of PM_{2.5} emissions and high precursor emissions, especially SO₂ and NO_x, virtually all of which are emitted from an existing, stationary emission source, the Baldwin Power Station. Figure 18 shows the location of the Baldwin plant in northern Randolph County. Because of the high levels of precursor emissions, and because of the close proximity of the Baldwin facility to the southern edge of St. Clair County, the IEPA has carefully considered whether to recommend that a portion of Randolph County be designated as nonattainment for PM_{2.5}. However, the Baldwin plant may be subject, in the near

future, to significant new emission reduction requirements as a result of litigation and new State and Federal regulatory initiatives. Since the plant may be required to substantially reduce emissions regardless of the area's PM2.5 designation, IEPA is not recommending that Baldwin Township, where the Baldwin plant is located, be designated as nonattainment at this time. Rather, IEPA recommends that Baldwin Township be designated as unclassifiable for the PM2.5 standards, and the remainder of Randolph County should be designated as attainment. If the anticipated emission reduction requirements are substantially delayed, the IEPA may seek to designate Baldwin Township in Randolph County as a nonattainment area in the future.

Remainder of Illinois

Areas of the state that are not part of these two metropolitan areas are in attainment with the PM2.5 NAAQS, and it is recommended that all remaining counties be designated as attainment.

Figure 1

Proposed PM2.5 Nonattainment Areas in Illinois

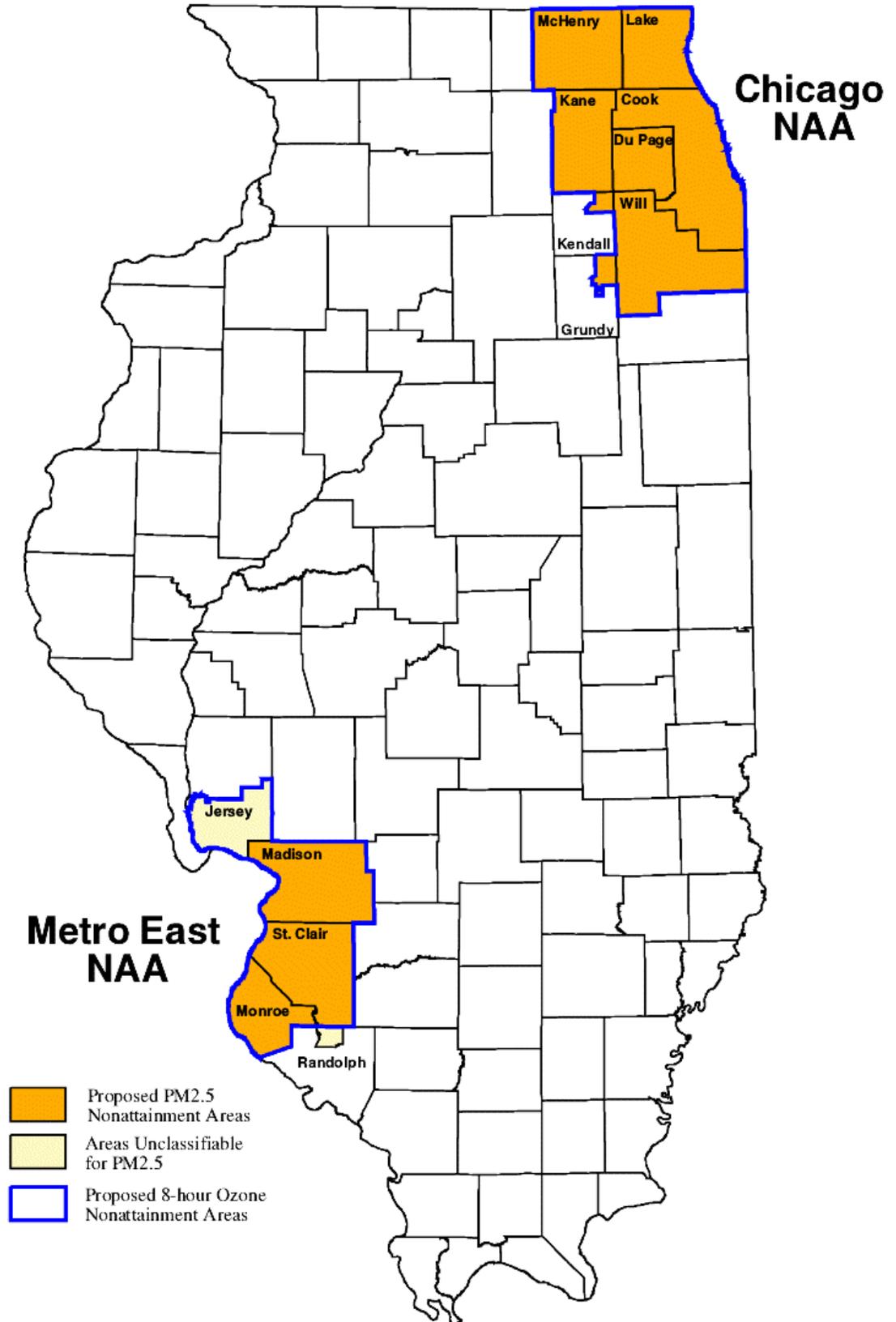


Figure 2

2000-2002 Annual PM2.5 Design Values

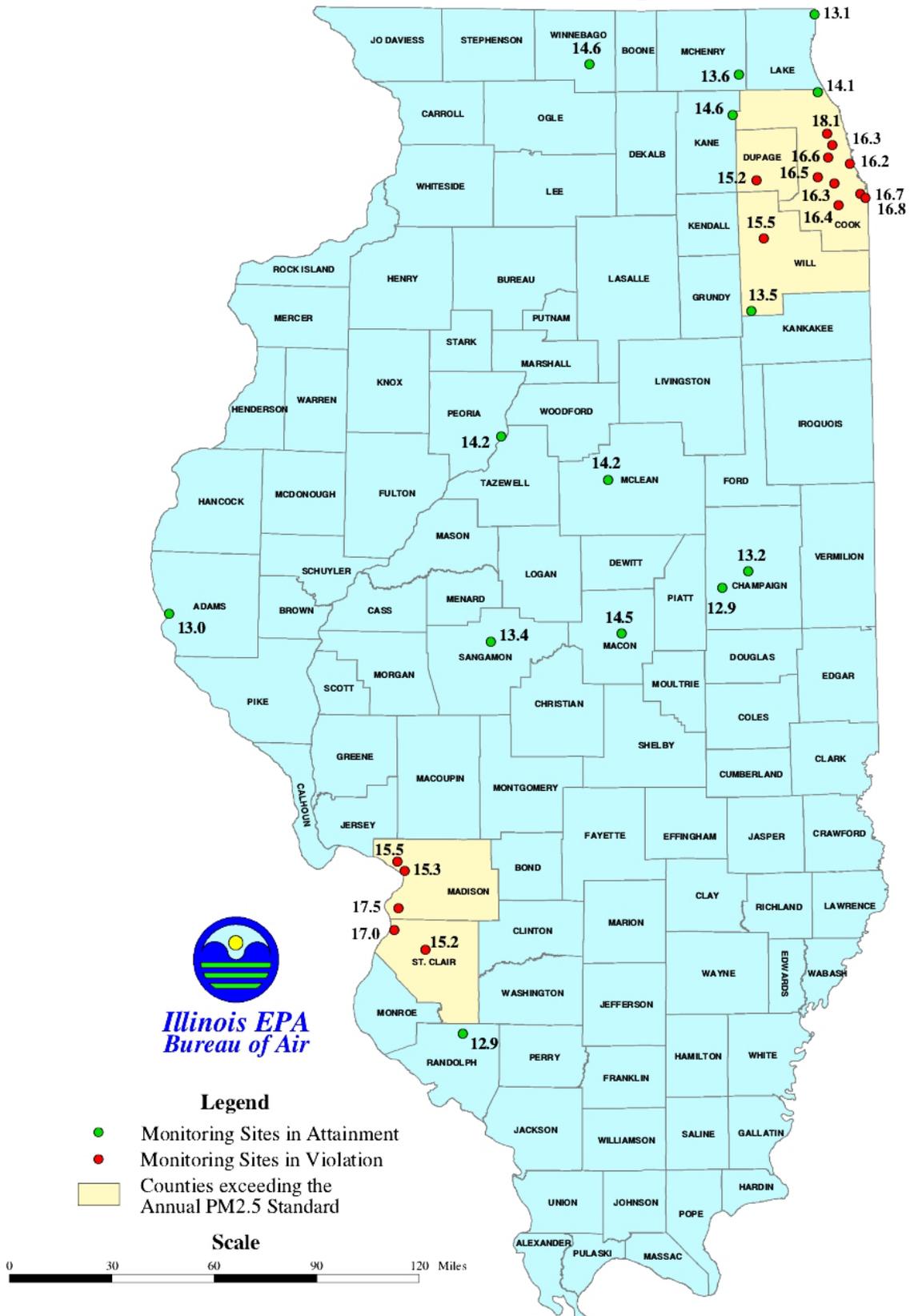
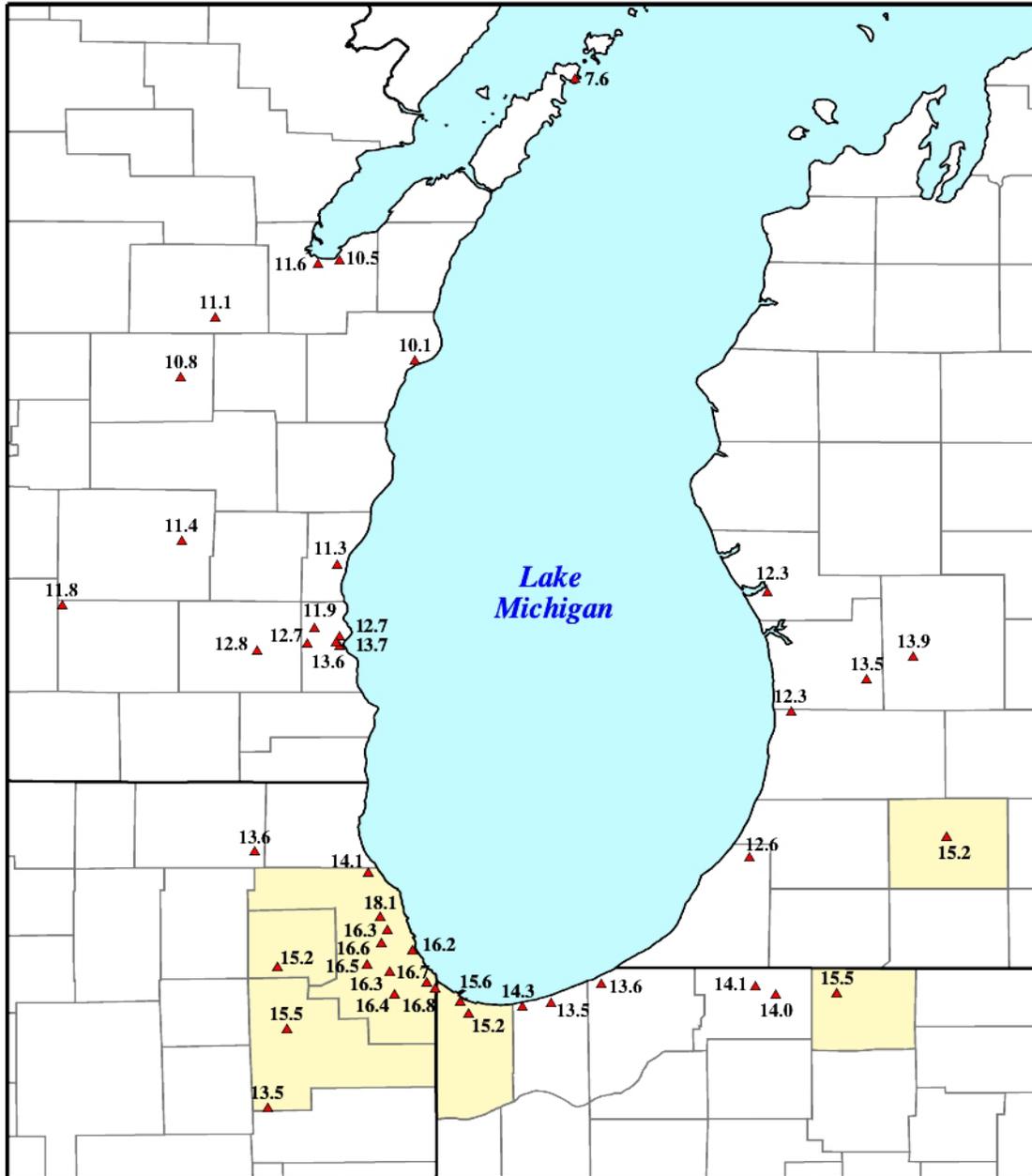


Figure 4

2000-2002 Lake Michigan Annual PM2.5 Design Values



Legend

- ▲ PM2.5 Monitors
- Counties exceeding the Annual PM2.5 Standard

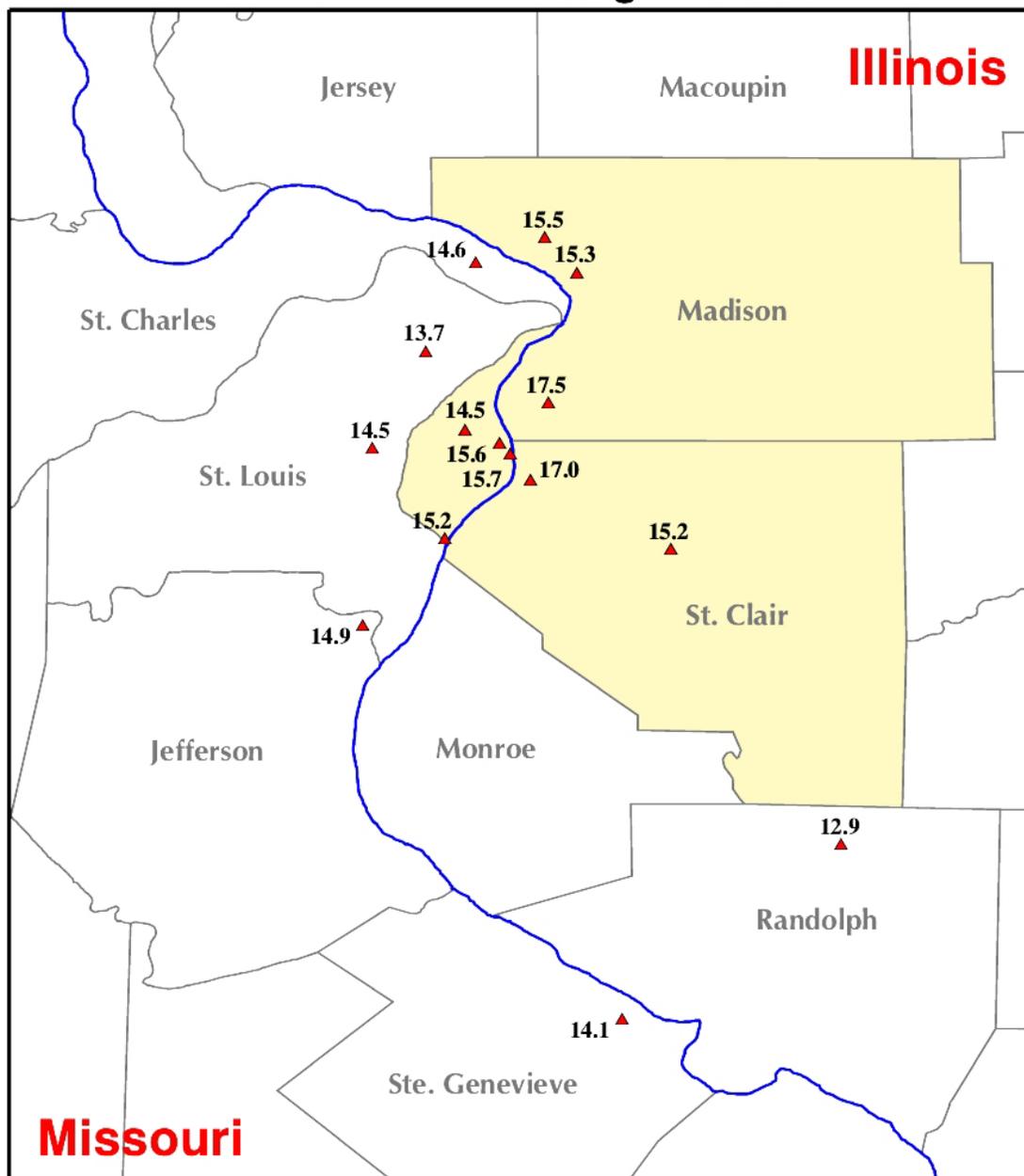
Scale

0 20 40 60 Miles



Figure 5

2000-2002 St. Louis Annual PM2.5 Design Values



Legend

- ▲ PM2.5 Monitors
- Counties exceeding the Annual PM2.5 Standard

Scale

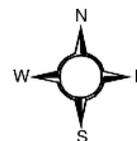
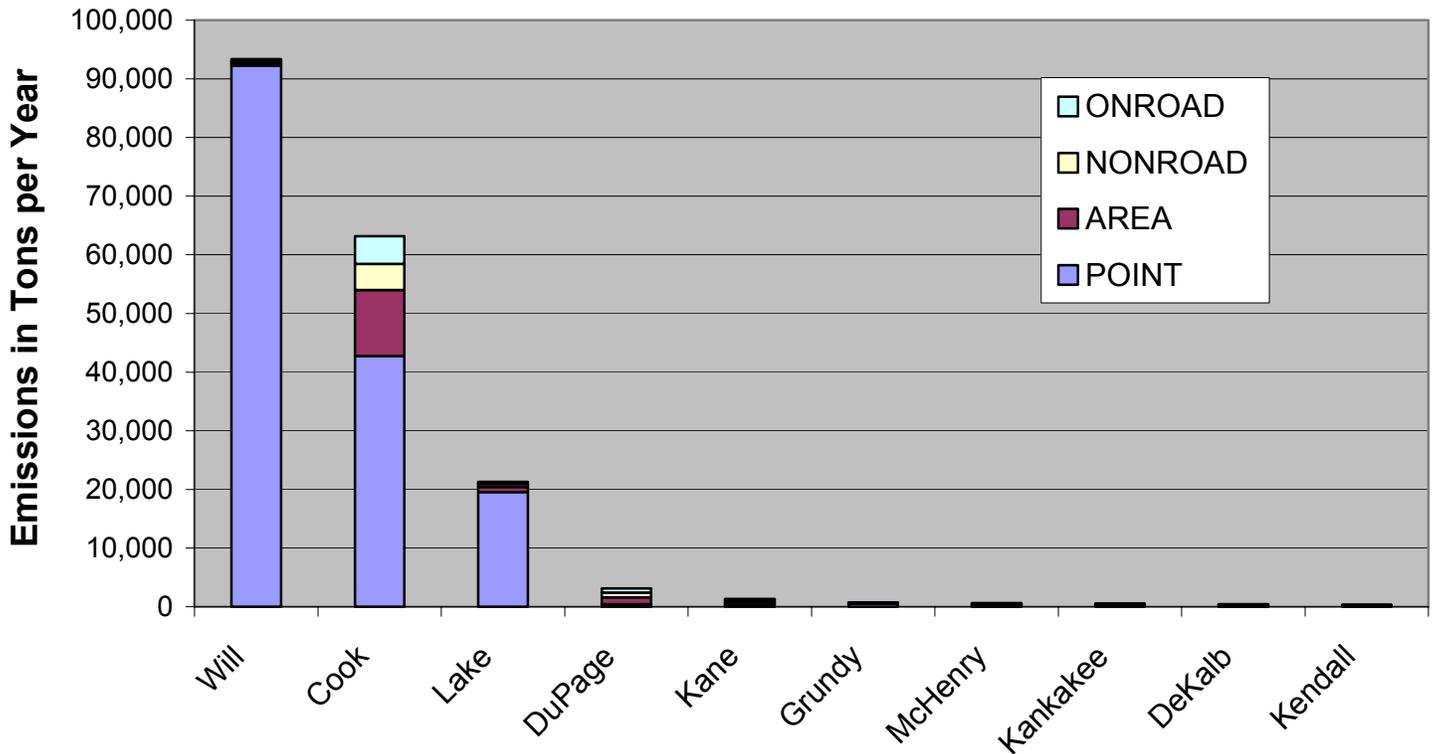


FIGURE 6a

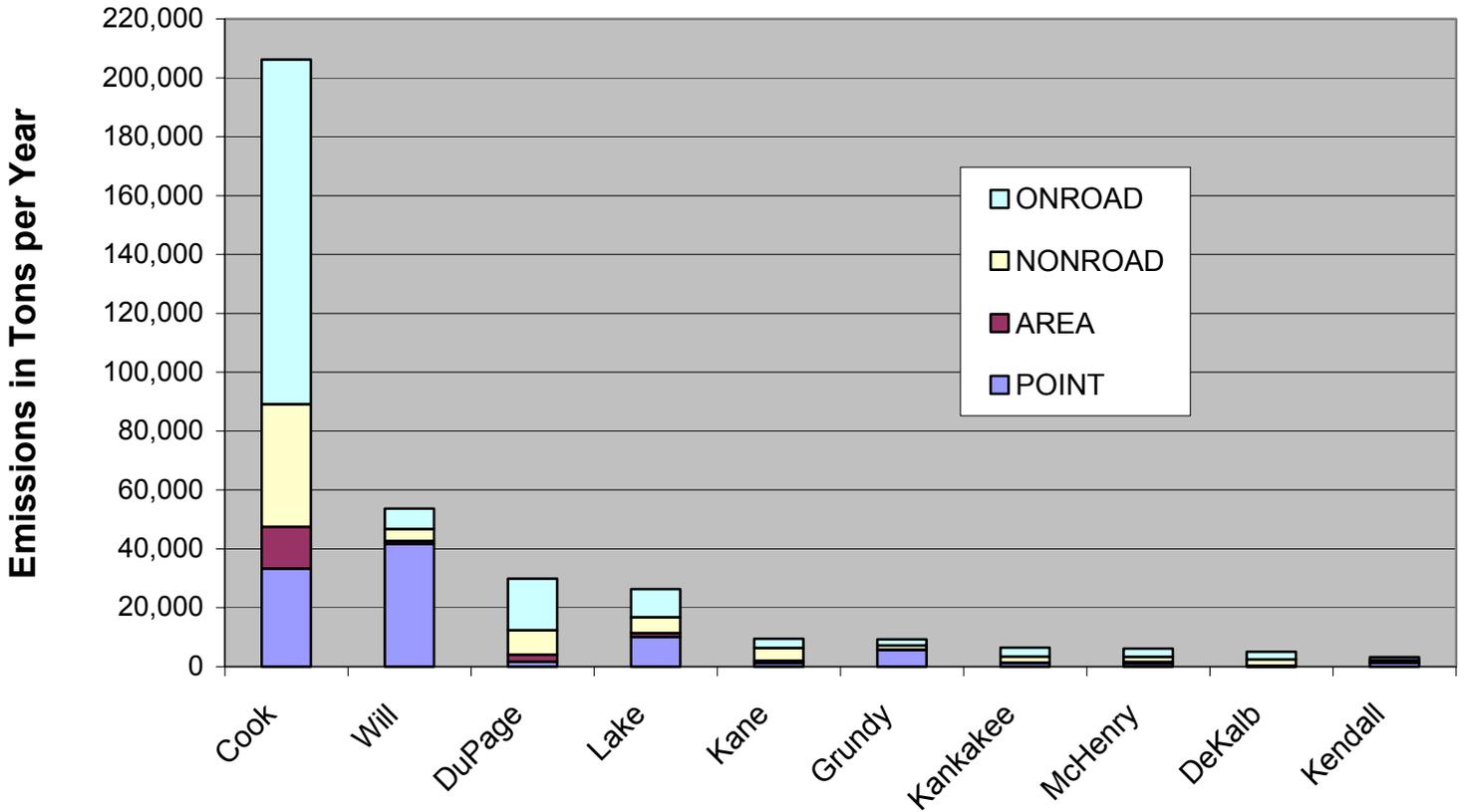
1999 SO2 Emissions by County for the Chicago CMSA



SO2 (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Will	92,268.58	381.22	261.62	409.24	93,320.66
Cook	42,744.67	11,257.92	4,679.01	4,474.67	63,156.27
Lake	19,563.78	832.86	378.10	521.48	21,296.22
DuPage	431.49	1,188.10	701.32	821.65	3,142.56
Kane	301.51	514.68	115.37	428.59	1,360.15
Grundy	474.92	67.73	69.65	154.95	767.25
McHenry	146.58	214.87	102.26	176.59	640.30
Kankakee	61.45	212.57	110.84	156.58	541.44
DeKalb	7.00	154.52	91.42	186.31	439.25
Kendall	151.76	45.76	36.79	73.27	307.58

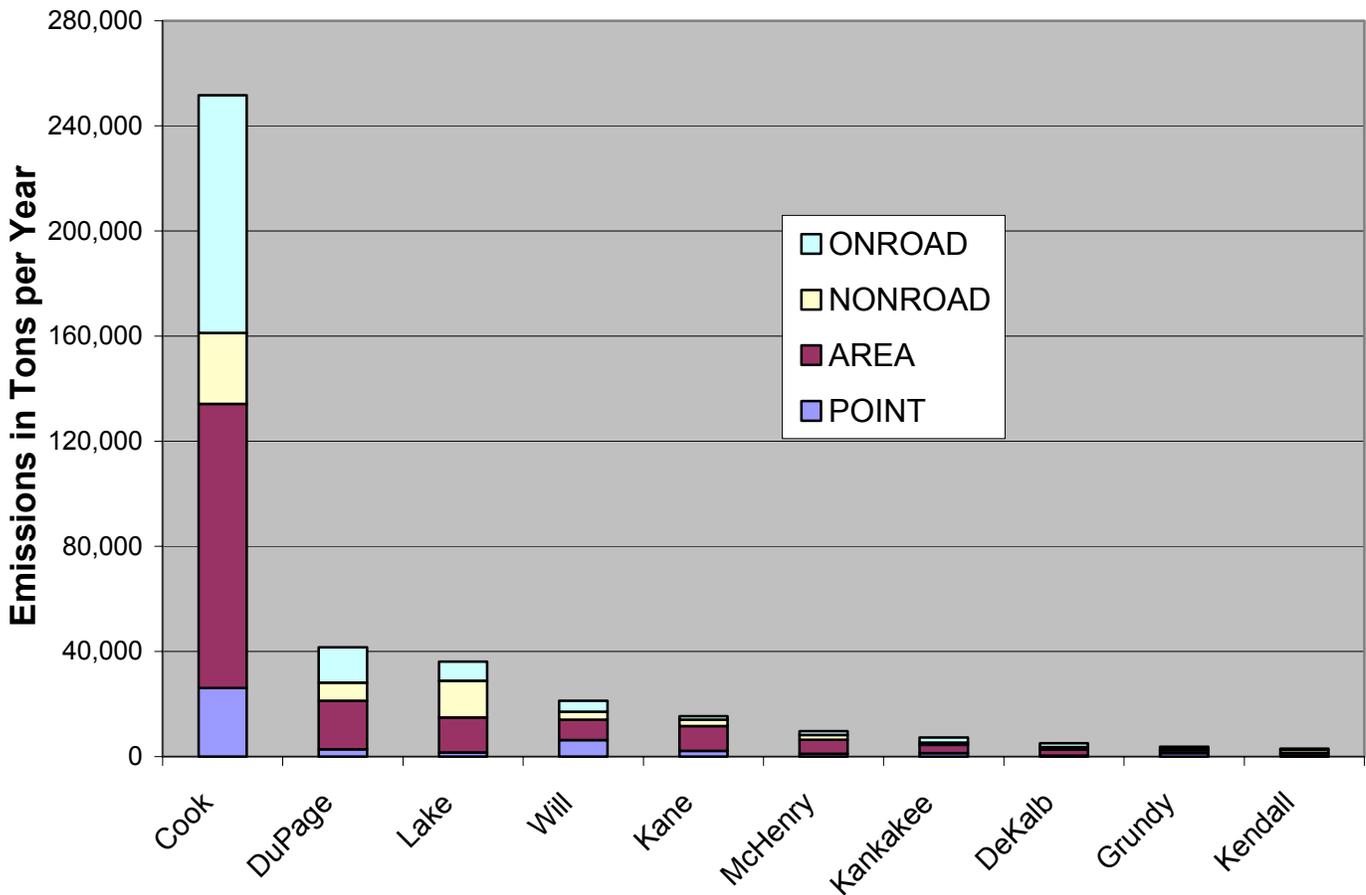
FIGURE 6b

1999 NOx Emissions by County for the Chicago CMSA



NOx (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Cook	33,360.92	14,228.06	117,076.52	41,568.40	206,233.90
Will	41,693.54	951.62	6,865.61	4,144.48	53,655.25
DuPage	1,737.47	2,406.56	17,552.37	8,207.61	29,904.01
Lake	10,085.01	1,292.50	9,475.59	5,399.17	26,252.27
Kane	1,176.13	907.98	3,139.80	4,275.63	9,499.54
Grundy	5,686.21	89.14	1,974.68	1,496.17	9,246.20
Kankakee	1,170.58	268.64	2,988.52	1,994.44	6,422.18
McHenry	1,033.49	555.42	2,709.03	1,799.64	6,097.58
DeKalb	114.20	193.06	2,510.65	2,205.33	5,023.24
Kendall	1,277.93	115.74	959.41	835.50	3,188.58

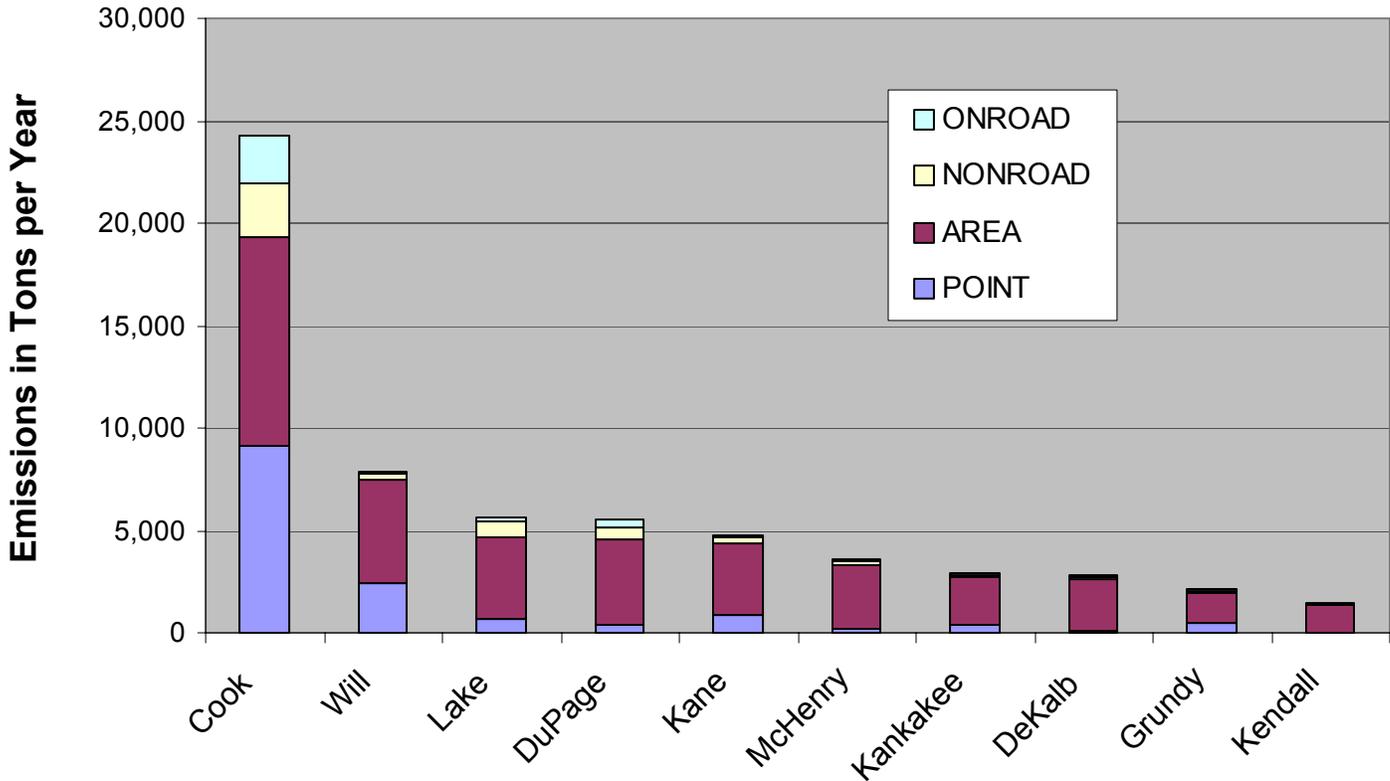
FIGURE 6c
1999 VOC Emissions by County for the Chicago CMSA



VOC (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Cook	26,044.82	108,139.44	90,346.11	27,060.60	251,590.97
DuPage	2,783.31	18,472.83	13,529.00	6,834.21	41,619.35
Lake	1,621.67	13,290.22	7,244.41	13,931.53	36,087.83
Will	6,244.80	7,790.22	4,038.48	3,113.12	21,186.62
Kane	2,185.79	9,474.34	1,440.28	2,340.31	15,440.72
McHenry	1,119.97	5,336.08	1,468.10	1,799.31	9,723.46
Kankakee	1,361.91	3,174.96	1,970.27	801.05	7,308.19
DeKalb	376.20	2,284.15	1,567.26	915.64	5,143.25
Grundy	1,300.18	1,171.15	926.14	366.58	3,764.05
Kendall	296.18	1,002.24	510.65	1,199.08	3,008.15

FIGURE 6d

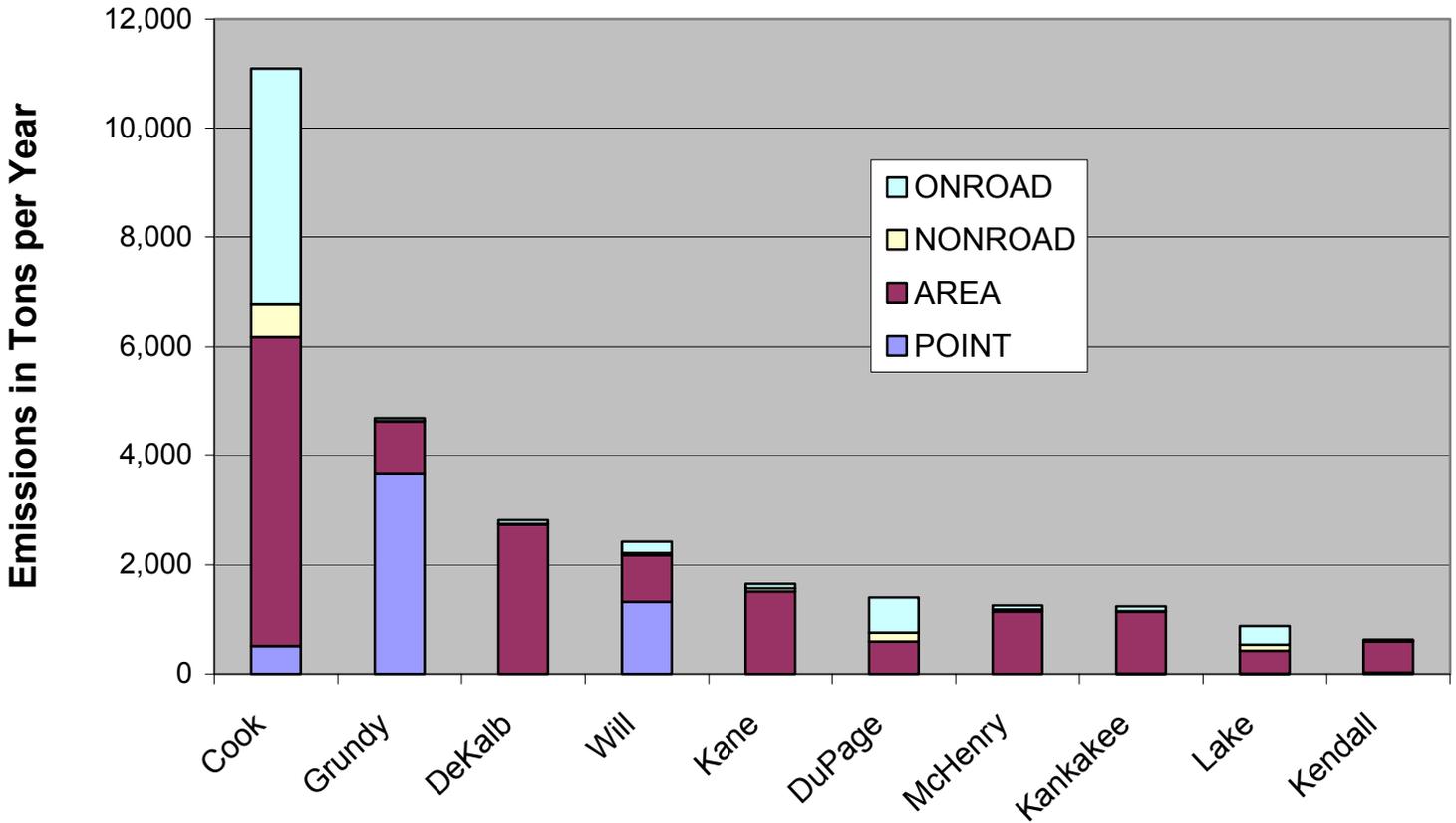
1999 PM2.5 Emissions by County for the Chicago CMSA



PM2.5 (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Cook	9,104.27	10,254.96	2,367.73	2,584.81	24,311.77
Will	2,397.77	5,039.03	159.47	313.47	7,909.75
Lake	694.82	3,972.39	193.21	762.39	5,622.81
DuPage	428.93	4,113.60	355.29	611.88	5,509.70
Kane	885.44	3,444.13	78.91	320.26	4,728.74
McHenry	210.38	3,136.82	66.24	169.87	3,583.30
Kankakee	350.43	2,347.67	66.80	137.09	2,901.99
DeKalb	50.32	2,554.39	56.86	150.89	2,812.46
Grundy	516.53	1,450.52	45.91	95.92	2,108.88
Kendall	26.11	1,313.23	24.08	82.71	1,446.13

FIGURE 6e

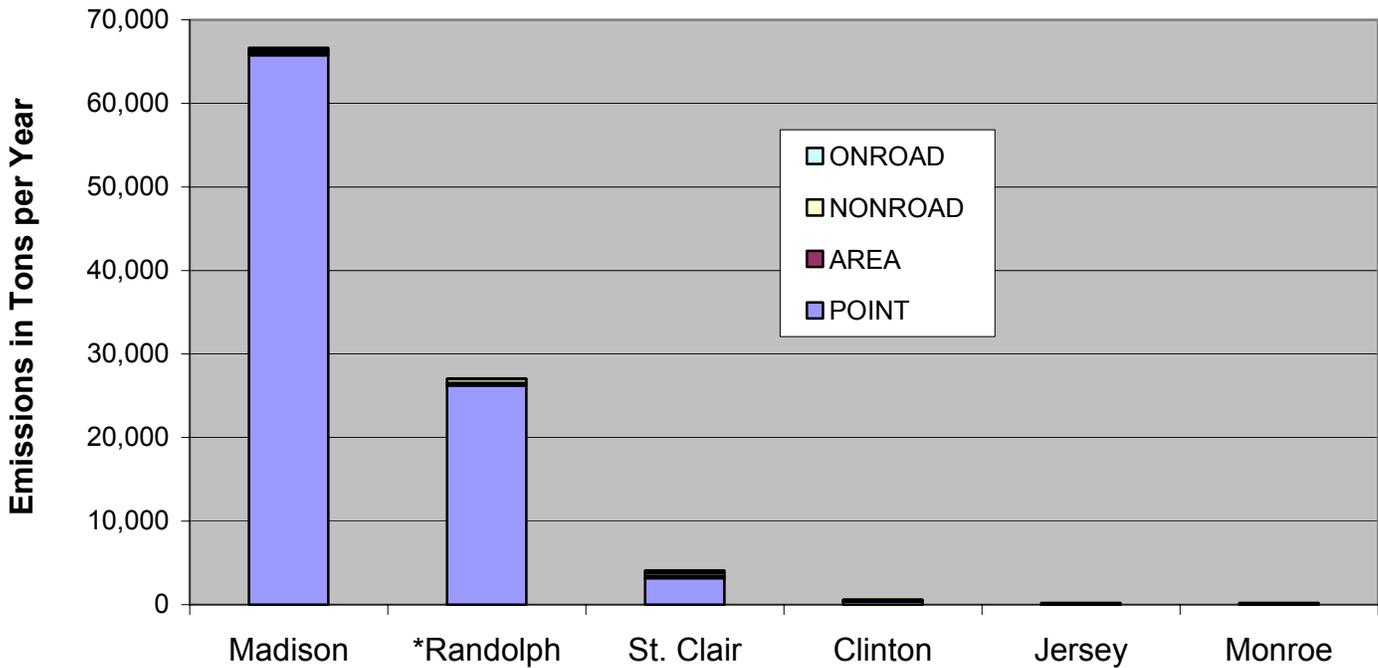
1999 NH3 Emissions by County for the Chicago CMSA



NH3 (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Cook	510.59	5,663.92	4,318.24	601.94	11,094.69
Grundy	3,663.66	949.69	50.94	5.13	4,669.42
DeKalb	0.26	2,735.01	71.09	13.41	2,819.77
Will	1,318.22	855.24	207.51	39.37	2,420.34
Kane	0.00	1,513.20	80.77	58.65	1,652.62
DuPage	1.63	592.24	646.70	159.25	1,399.82
McHenry	0.00	1,145.76	76.35	34.36	1,256.47
Kankakee	6.68	1,129.88	88.76	13.34	1,238.66
Lake	3.36	423.35	346.53	105.98	879.22
Kendall	24.12	573.11	26.92	5.63	629.78

FIGURE 7a

1999 SO2 Emissions by County for the Metro-East St. Louis MSA

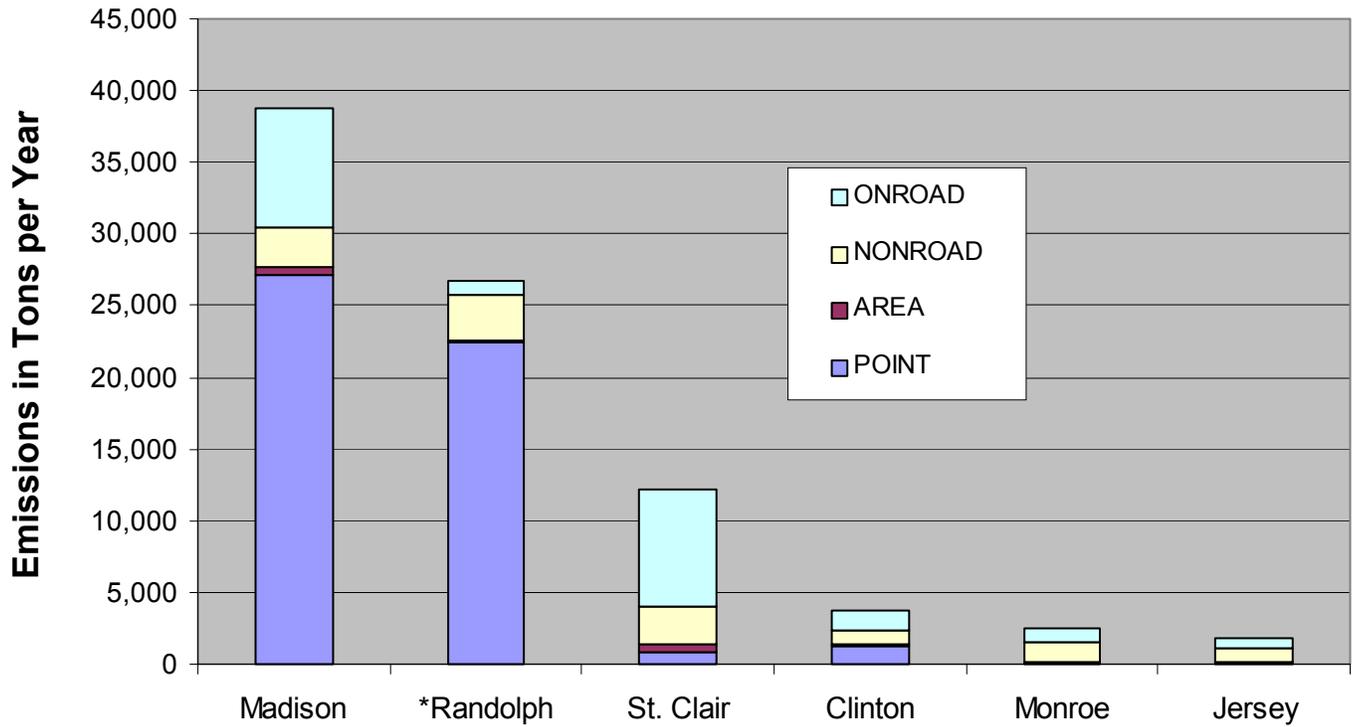


***2002 Point Source Emissions**

SO2 (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Madison	65,775.72	274.45	320.08	295.78	66,666.03
St. Clair	3,193.18	263.56	320.51	342.55	4,119.80
Clinton	362.63	104.86	49.88	88.16	605.53
Monroe	0.02	15.80	33.61	195.58	245.01
Jersey	0.00	44.49	26.02	174.52	245.03
*Randolph	26,267.50	277.00	36.45	480.67	27,061.62

FIGURE 7b

1999 NOx Emissions by County for the Metro-East St. Louis MSA

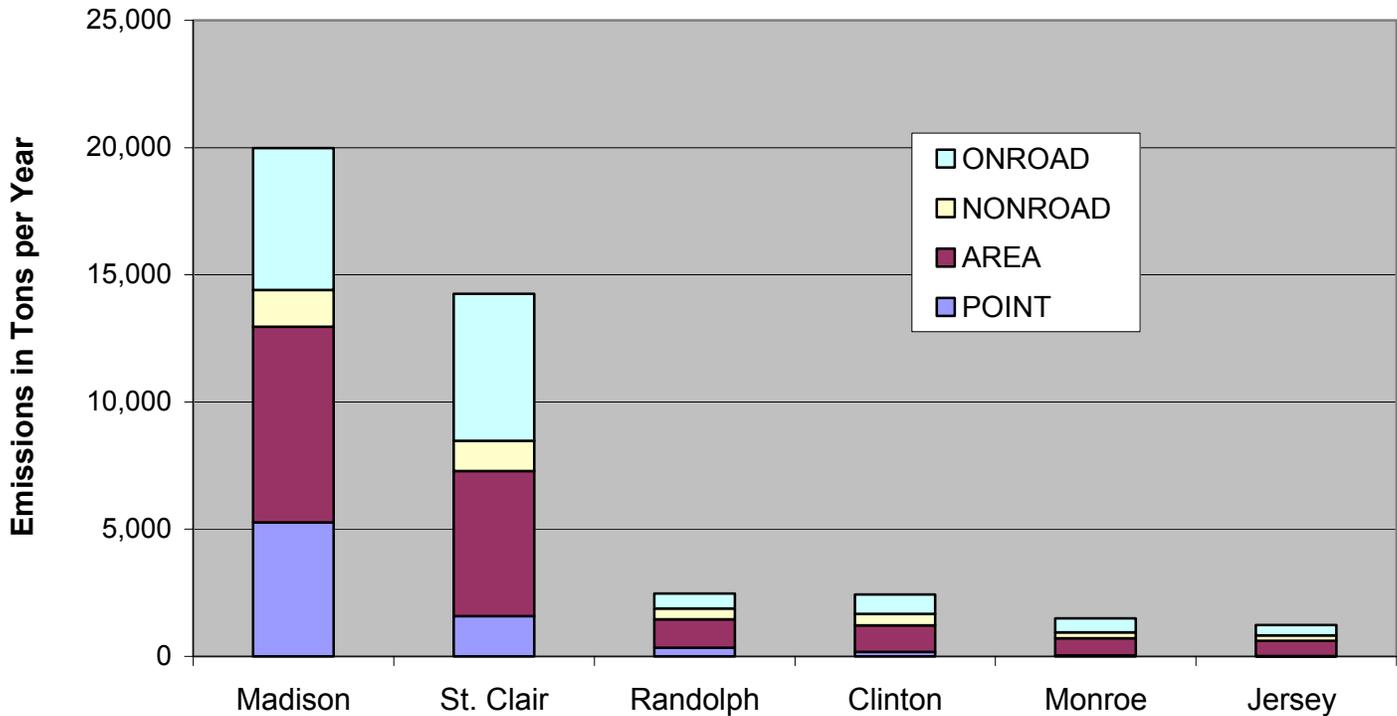


***2002 Point Source Emissions**

NOx (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Madison	27,138.20	599.38	8,323.62	2,731.30	38,792.50
St. Clair	770.21	599.93	8,118.32	2,688.02	12,176.48
Clinton	1,301.97	124.16	1,379.05	988.55	3,793.73
Monroe	10.29	65.75	895.49	1,503.33	2,474.86
Jersey	0.00	72.58	699.42	1,058.50	1,830.50
*Randolph	22,367.13	169.02	976.70	3,216.74	26,729.59

FIGURE 7c

1999 VOC Emissions by County for the Metro-East St. Louis MSA



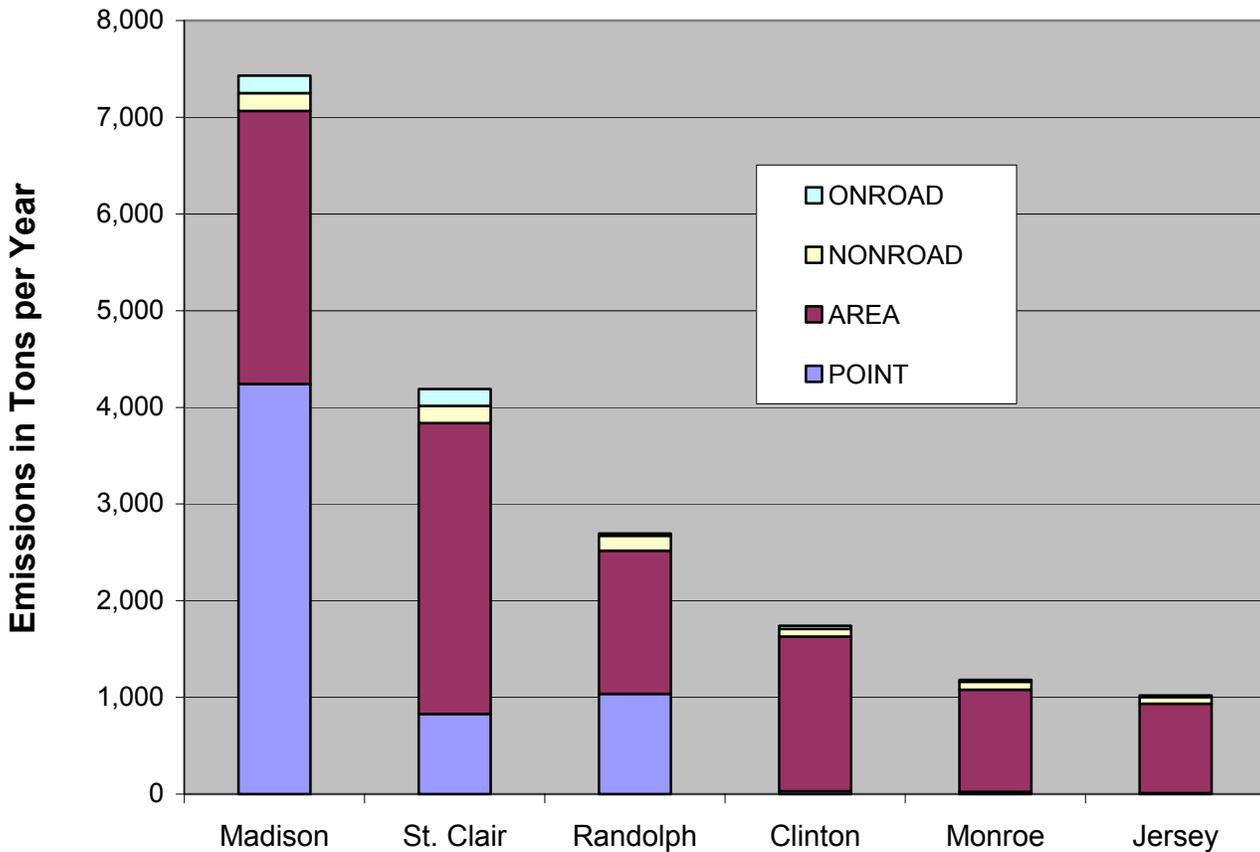
***2002 Point Source Emissions**

VOC (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Madison	5,264.98	7,690.34	5,568.87	1,452.74	19,976.93
St. Clair	1,579.59	5,715.01	5,777.90	1,186.15	14,258.65
Clinton	180.17	1,046.51	761.02	450.45	2,438.15
Monroe	37.79	675.47	538.99	240.83	1,493.08
Jersey	17.56	593.39	405.92	213.83	1,230.70

*Randolph 337.31 1,121.04 588.76 422.60 2,469.71

FIGURE 7d

1999 PM2.5 Emissions by County for the Metro-East St. Louis MSA



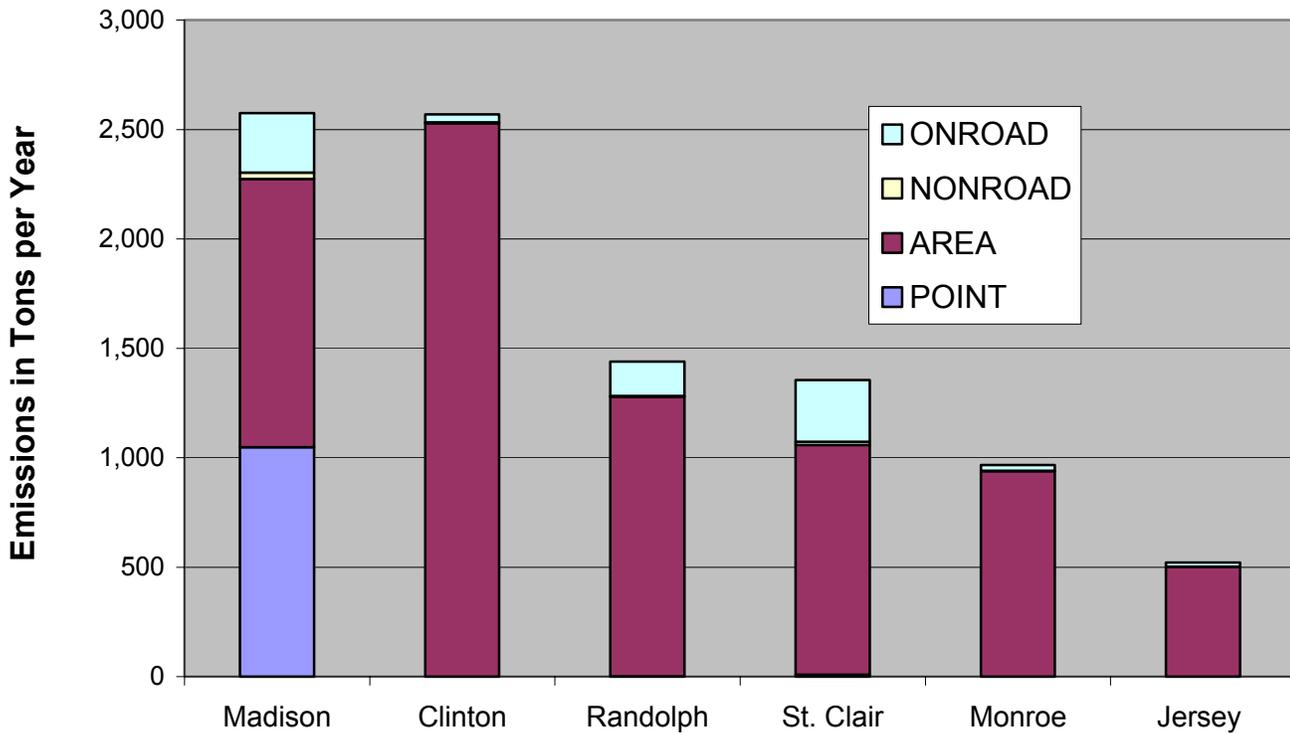
*2002 Point Source Emissions

PM2.5 (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Madison	4,240.81	2,822.97	180.75	185.66	7,430.19
St. Clair	827.68	3,007.90	172.39	179.95	4,187.92
Clinton	29.32	1,601.01	32.98	78.26	1,741.57
Monroe	22.88	1,057.21	20.92	80.22	1,181.23
Jersey	9.69	925.90	17.12	67.97	1,020.69

*Randolph 1,038.45 1,479.52 23.67 155.00 2,696.64

FIGURE 7e

1999 NH3 Emissions by County for the Metro-East St. Louis MSA



*2002 Point Source Emissions

NH3 (TPY)					
County	Point	Area	On-Road	Off-Road	Total
Madison	1,047.31	1,226.73	272.08	28.69	2,574.81
Clinton	0.00	2,528.75	36.22	4.07	2,569.04
St. Clair	9.27	1,048.49	282.48	15.17	1,355.41
Monroe	0.00	938.87	25.81	2.09	966.77
Jersey	0.00	500.33	18.97	1.91	521.21
*Randolph	1.43	1,276.05	157.00	5.15	1,439.63

Figure 8a

1999 Point Source SO₂ Emissions Chicago NAA

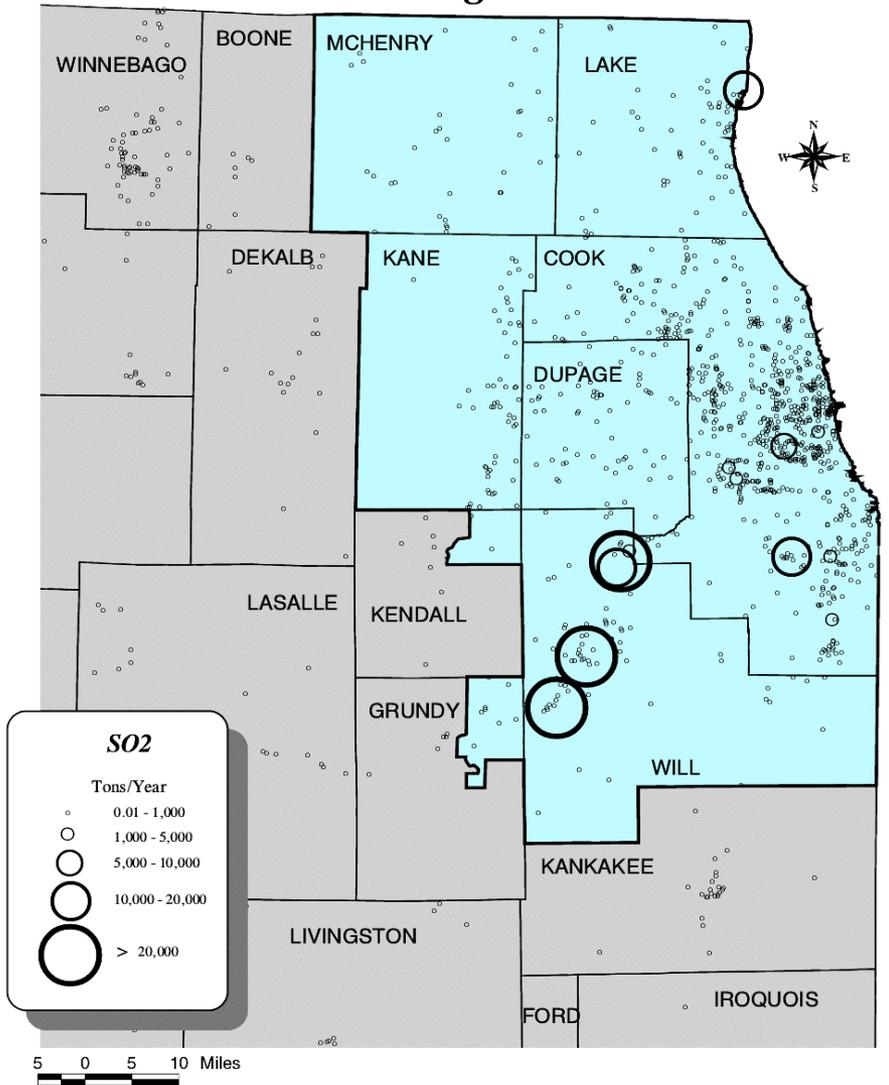


Figure 8b

1999 Point Source NO_x Emissions Chicago NAA

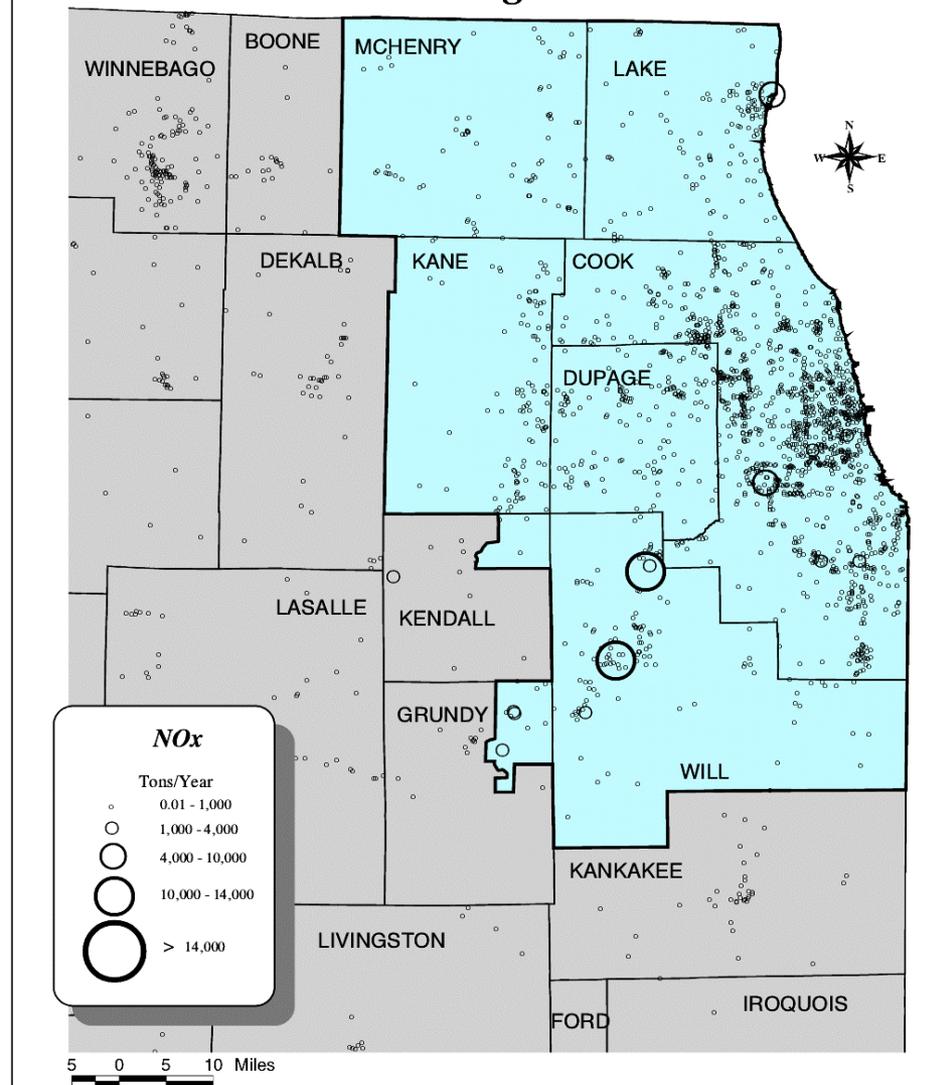


Figure 8c

1999 Point Source VOC Emissions Chicago NAA

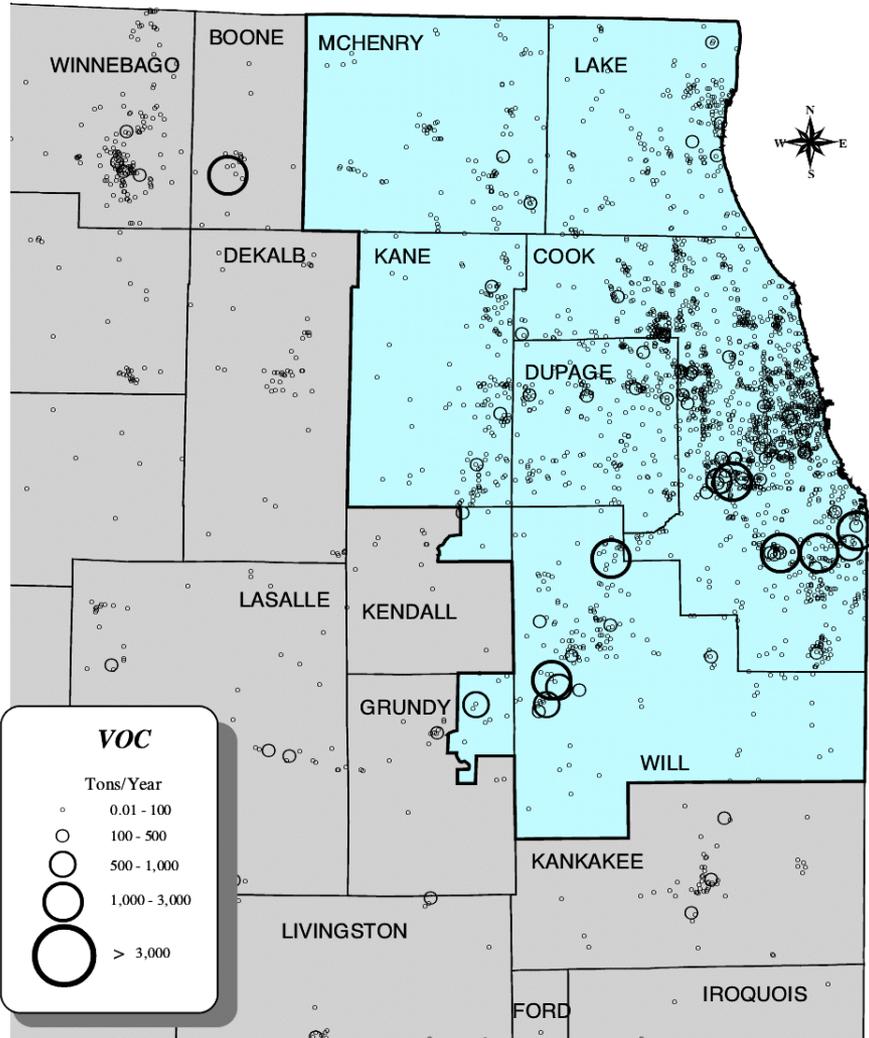


Figure 8d

1999 Point Source PM2.5 Emissions Chicago NAA

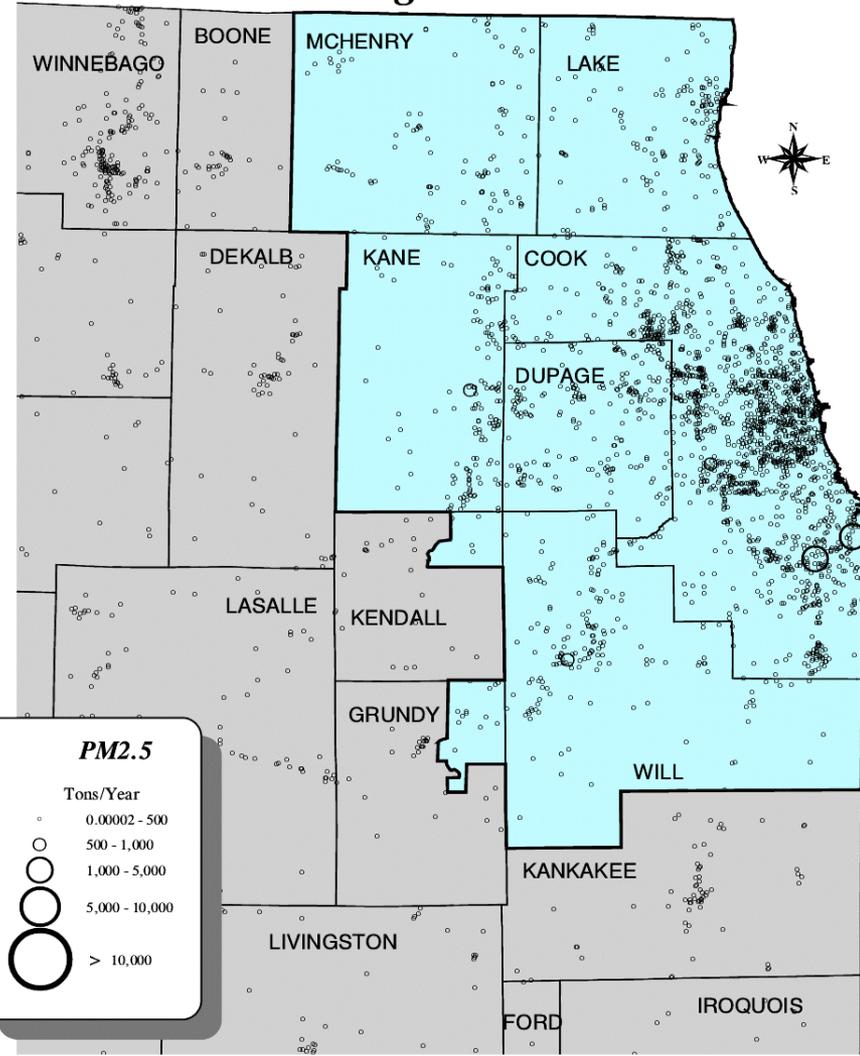


Figure 8e

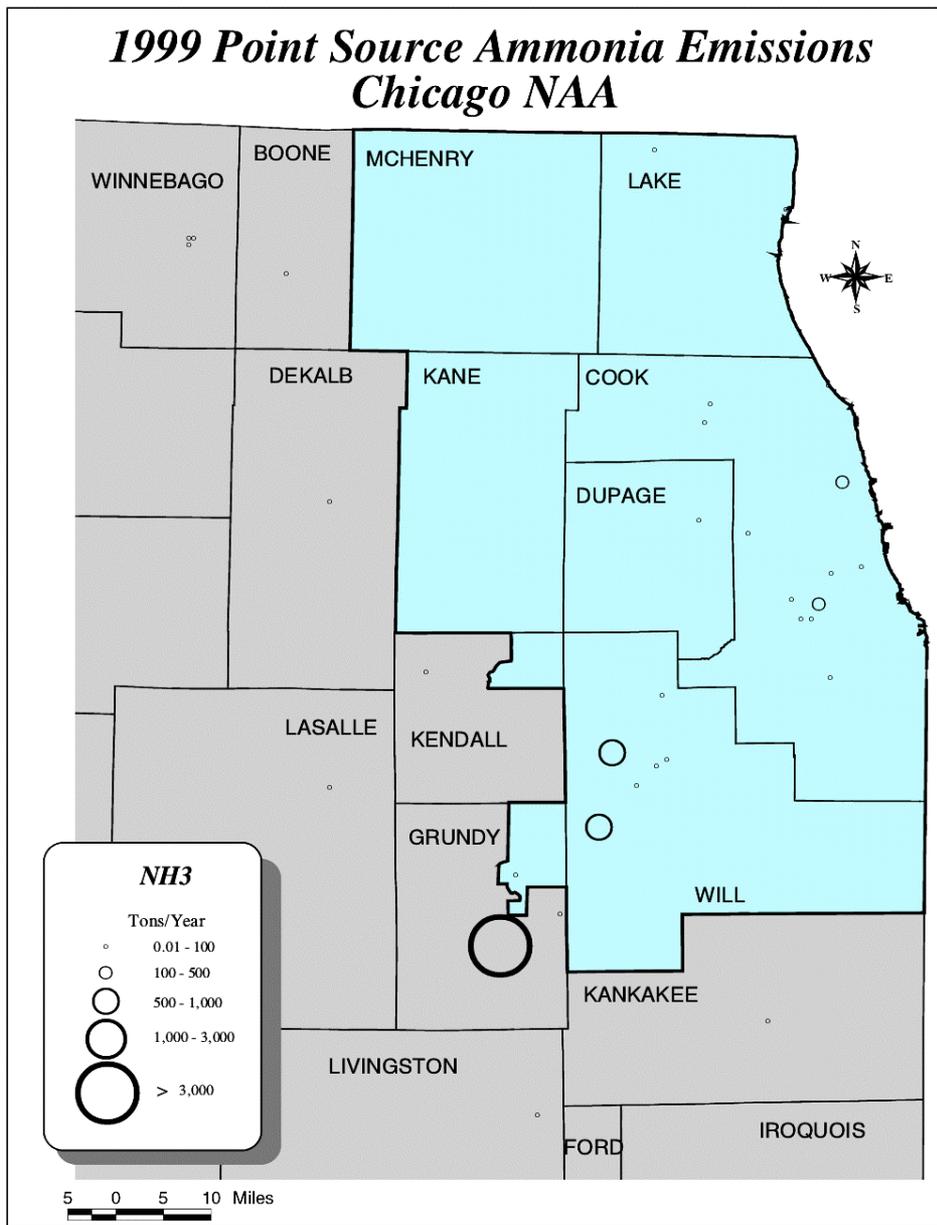


Figure 9a

1999 Point Source SO₂ Emissions Metro-East NAA

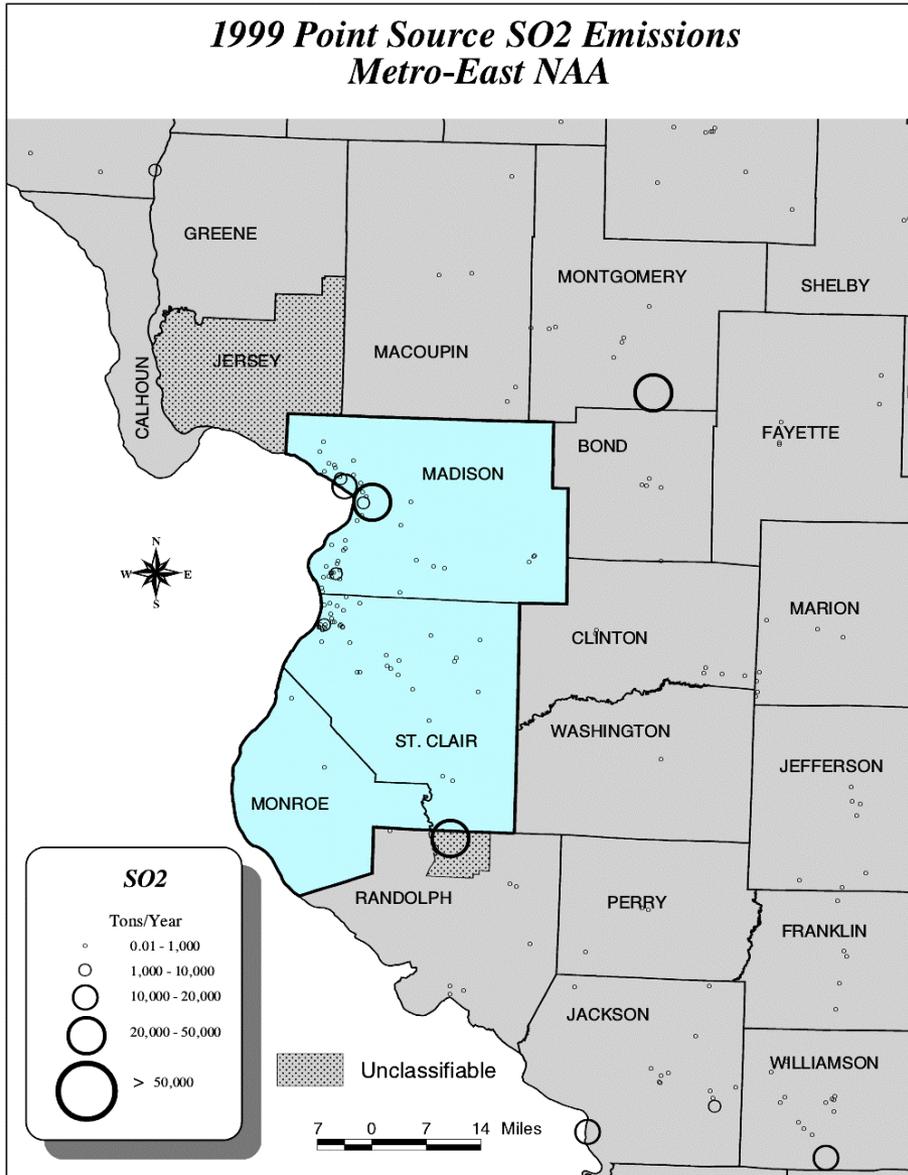


Figure 9b

1999 Point Source NO_x Emissions Metro-East NAA

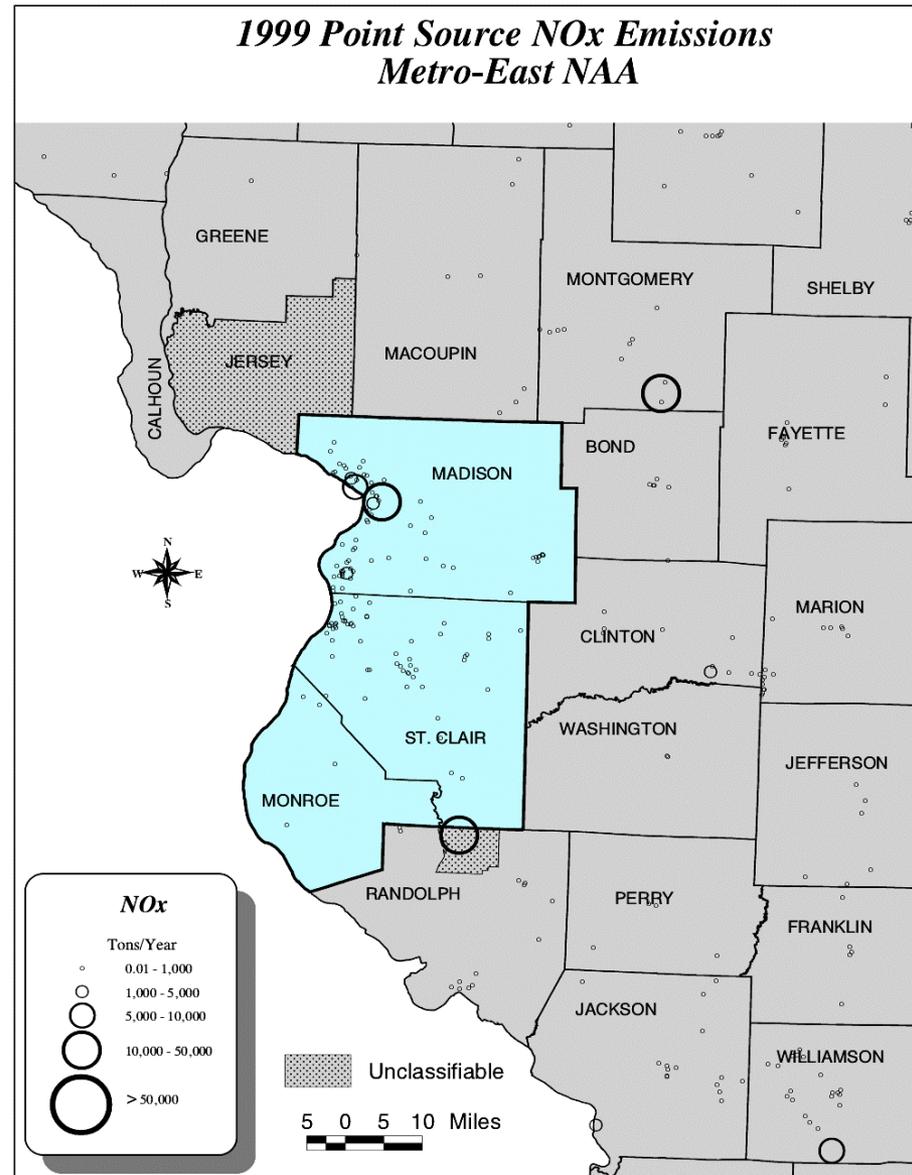


Figure 9c

1999 Point Source VOC Emissions Metro-East NAA

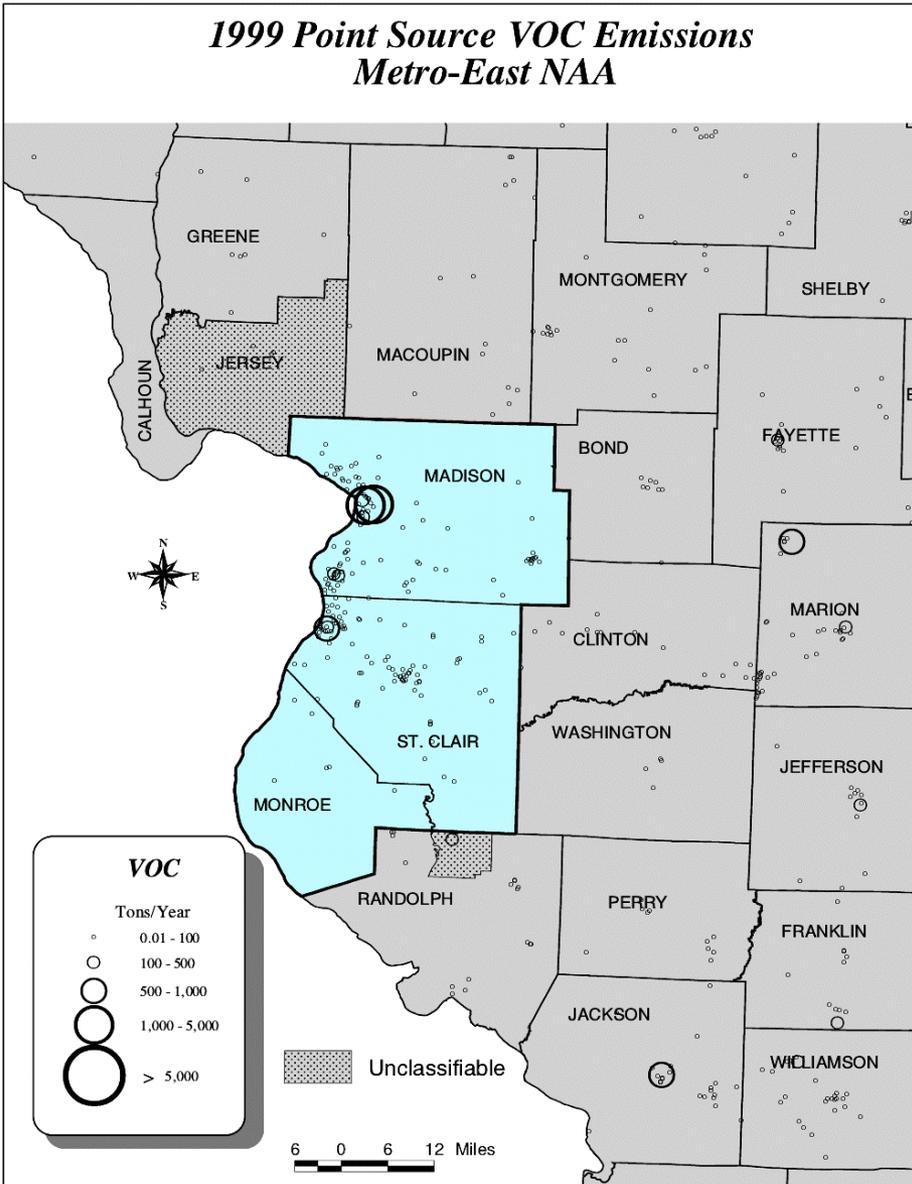


Figure 9d

1999 Point Source PM2.5 Emissions Metro-East NAA

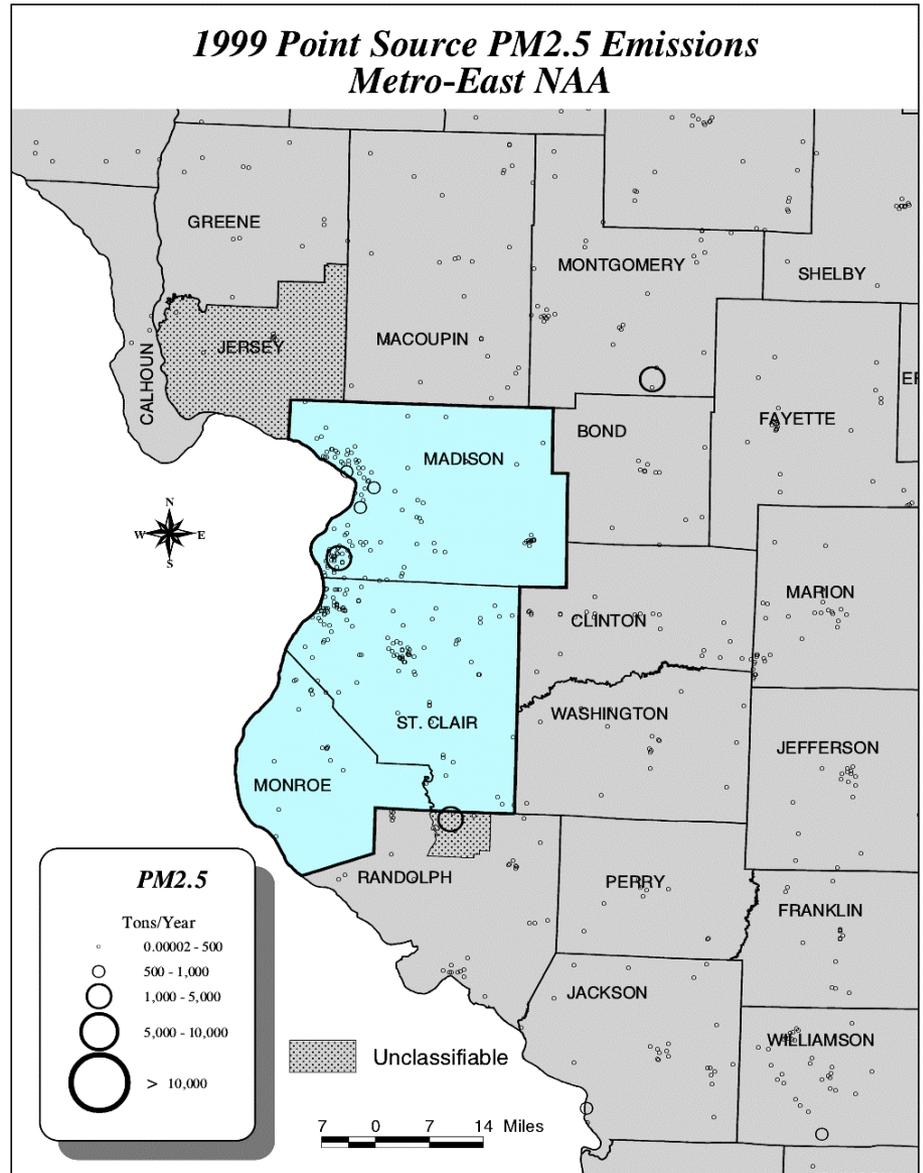


Figure 9e

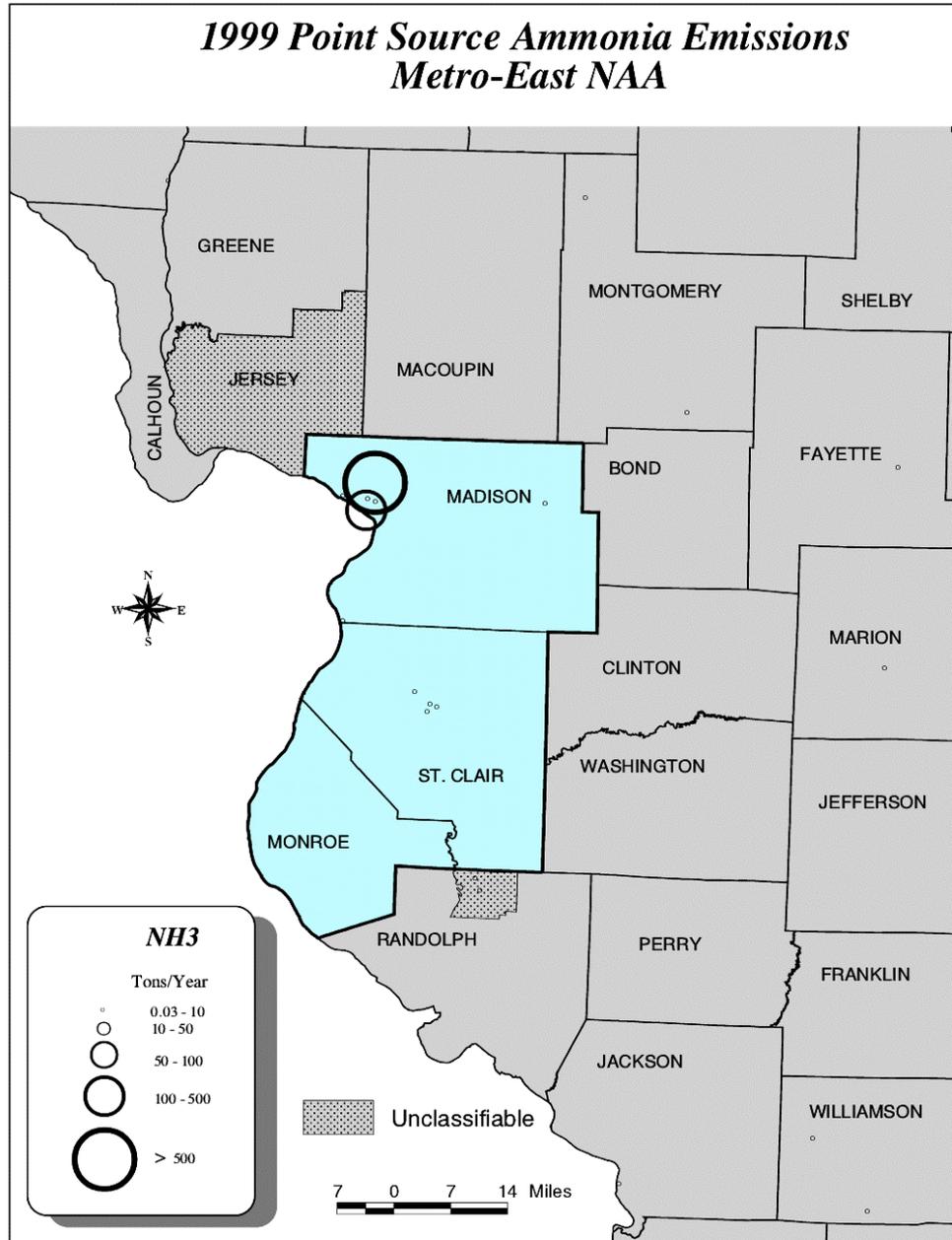
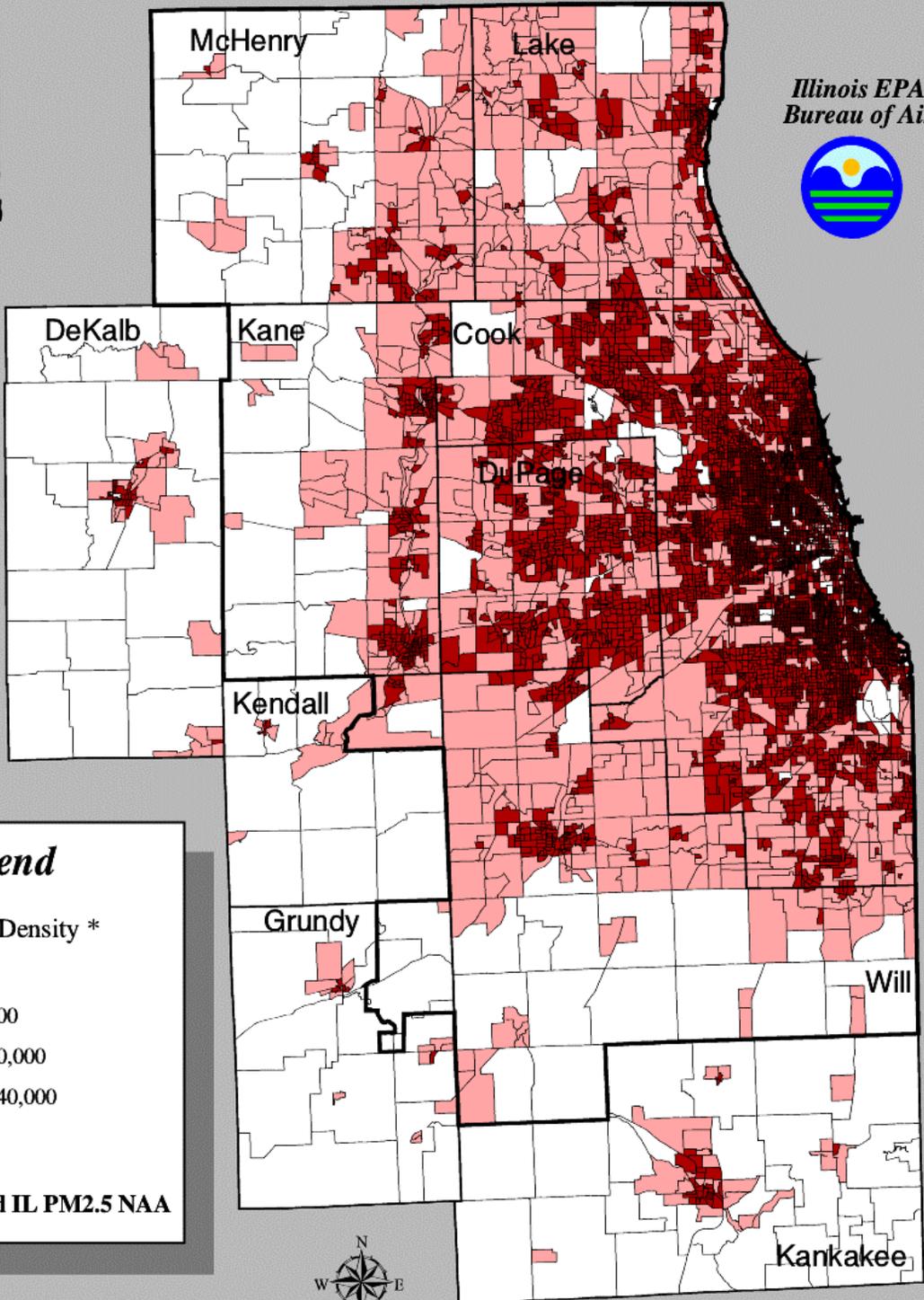


Figure 10

2000 Population Density Chicago-Gary-Kenosha CMSA (Illinois portion)



Illinois EPA
Bureau of Air



Legend

2000 Population Density *

-  0 - 200
-  200 - 2,500
-  2,500 - 10,000
-  10,000 - 40,000
-  > 40,000

 Proposed IL PM2.5 NAA

*population per square mile
within a census block group



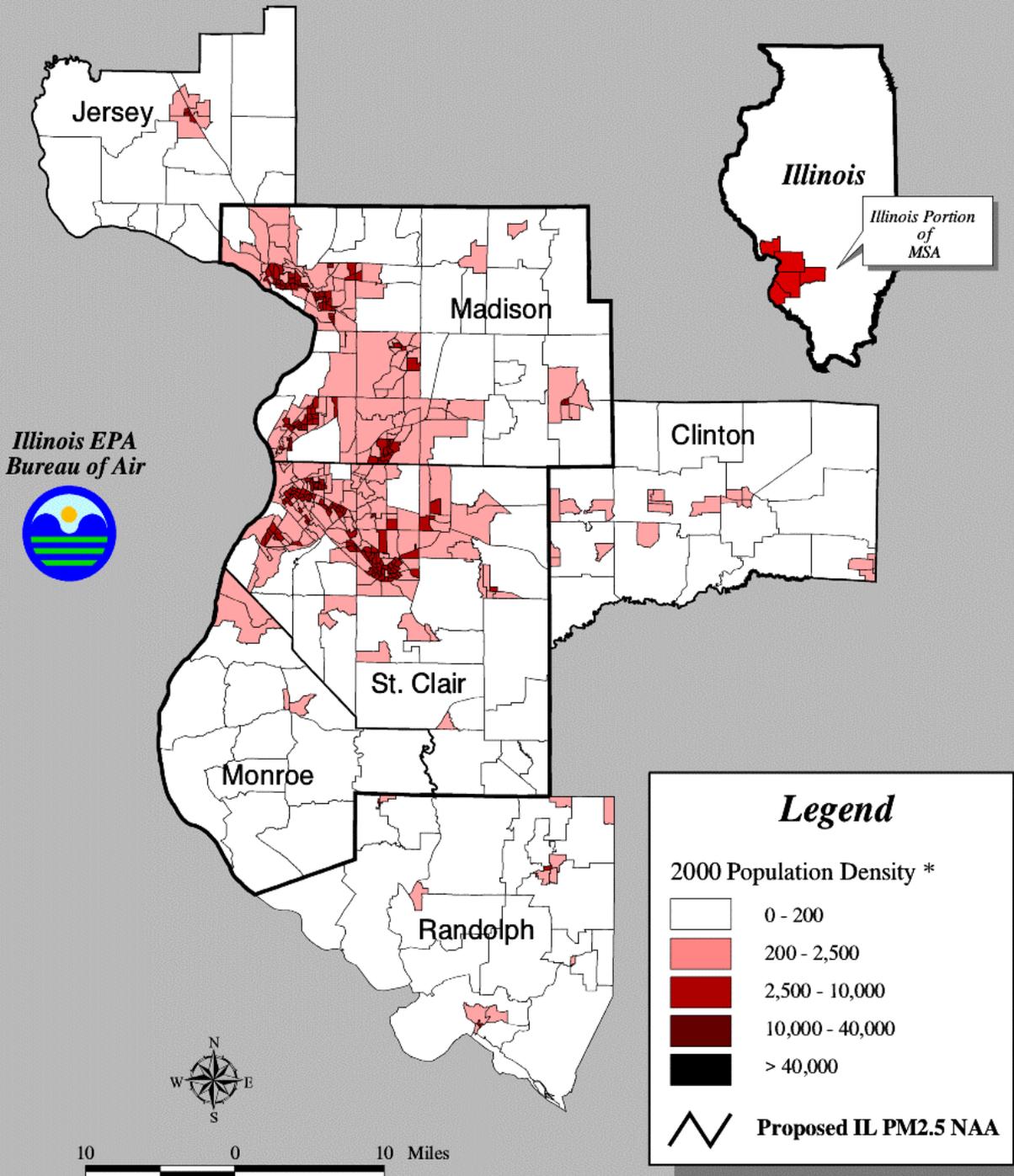
10 0 10 Miles

Source Information

ESRI Data 2002; U.S. Census Bureau;
Office of Management and Budget
1999 Consolidated Metropolitan
Statistical Areas (CMSAs) Datafile
Chicago and Kankakee PMSA portion shown

Figure 11

2000 Population Density St. Louis MO-IL MSA (Illinois portion)



Source Information

ESRI Data 2002; U.S. Census Bureau;
Office of Management and Budget
1999 Consolidated Metropolitan
Statistical Areas (MSAs) Datafile
St. Louis, IL MSA portion shown

**population per square mile
within a census block group*

Figure 12

Land Cover in Chicago-Gary-Kenosha CMSA (Illinois portion)

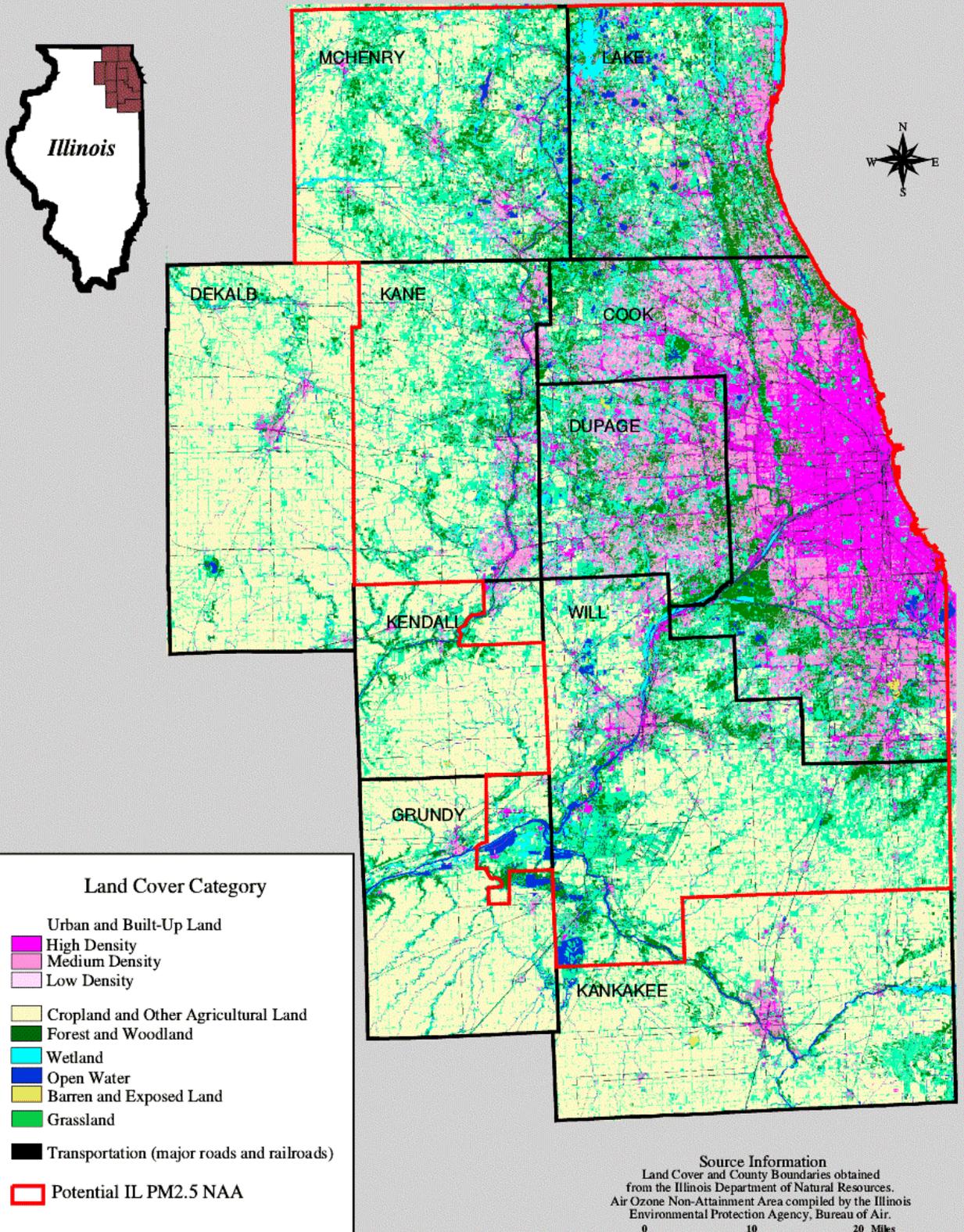
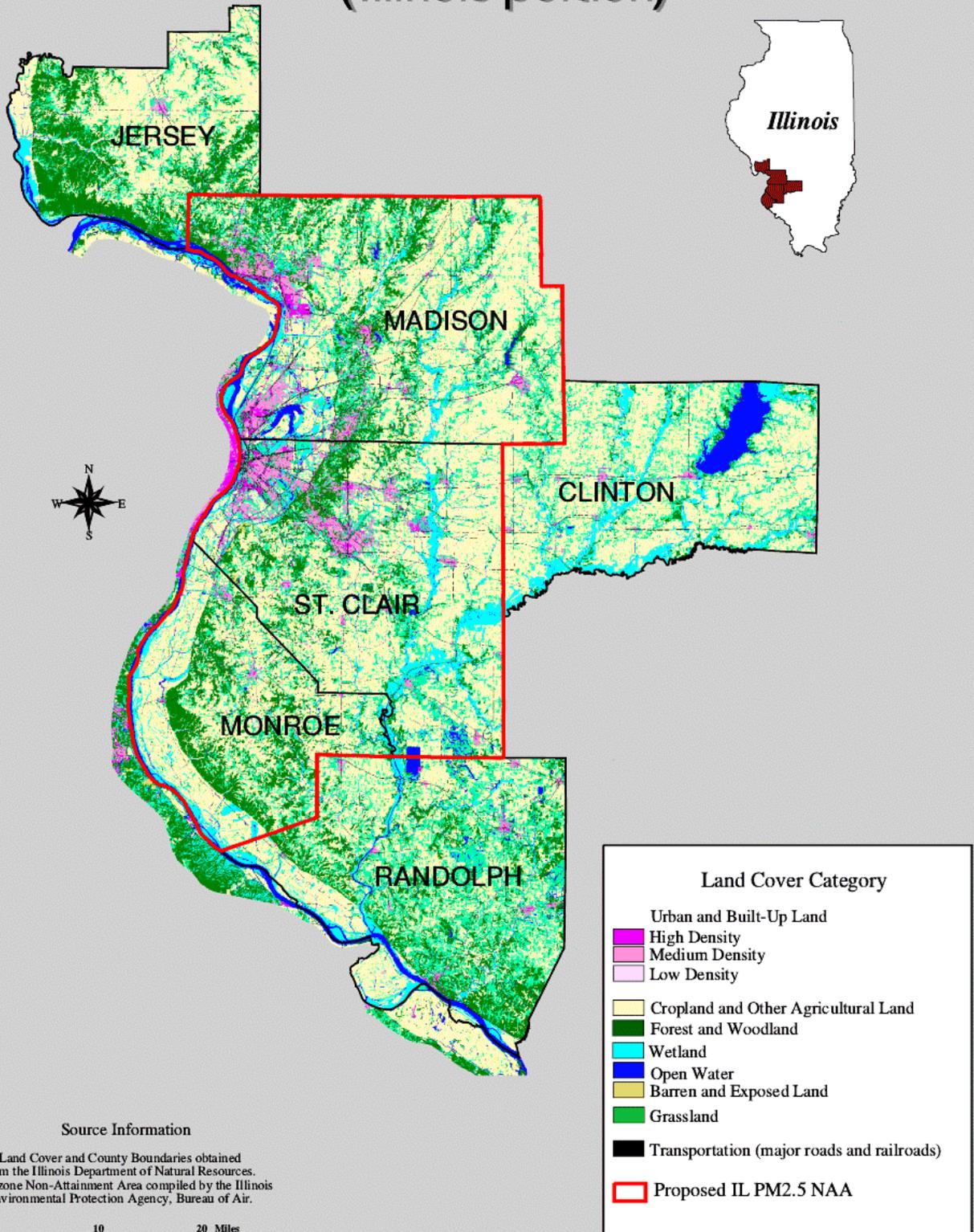


Figure 13

Land Cover in St. Louis MO-IL MSA (Illinois portion)



Source Information

Land Cover and County Boundaries obtained from the Illinois Department of Natural Resources. Air Ozone Non-Attainment Area compiled by the Illinois Environmental Protection Agency, Bureau of Air.

0 10 20 Miles

Figure 14

***Population Projections
Total Population by County
Change from 1995 - 2020***

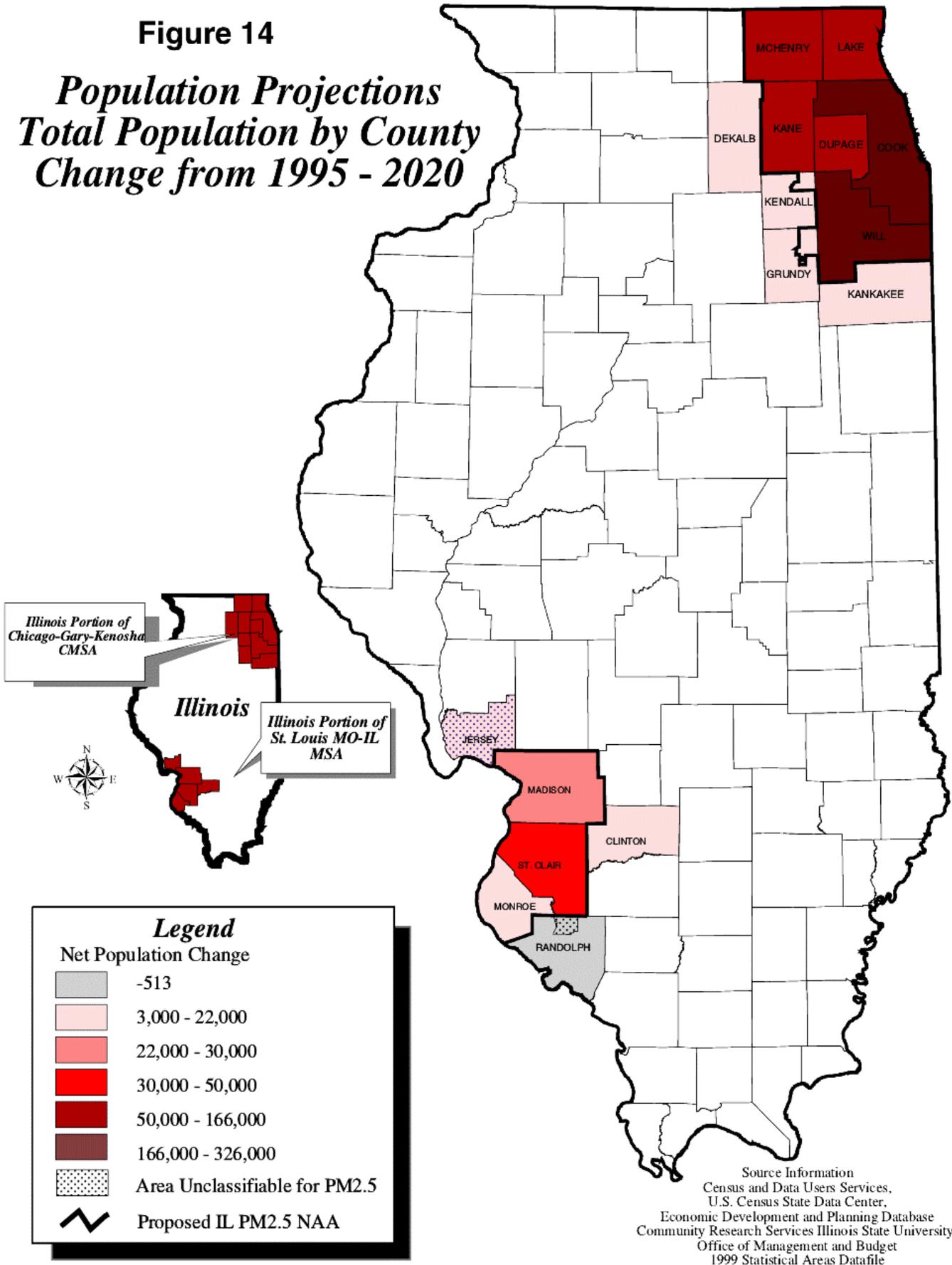
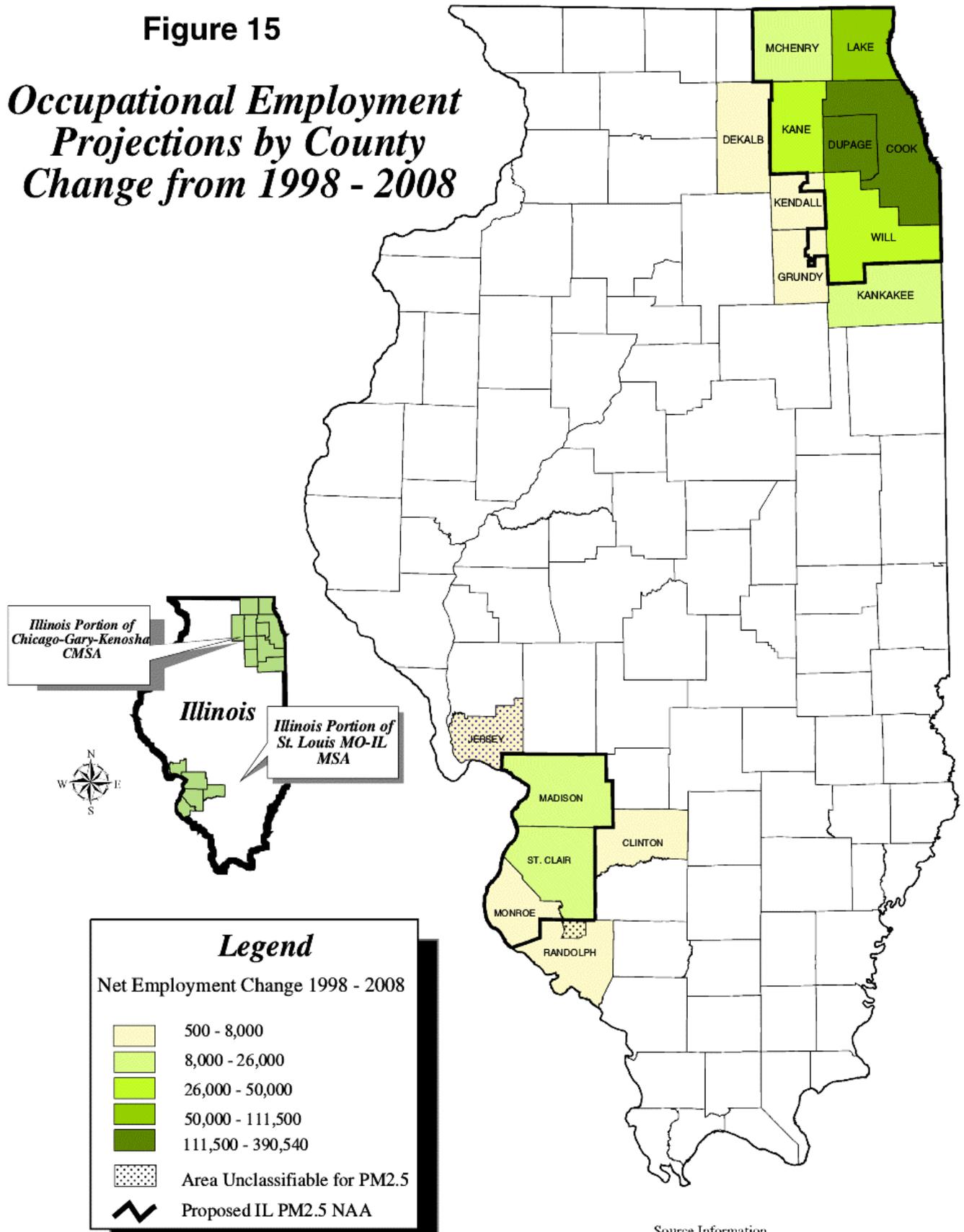


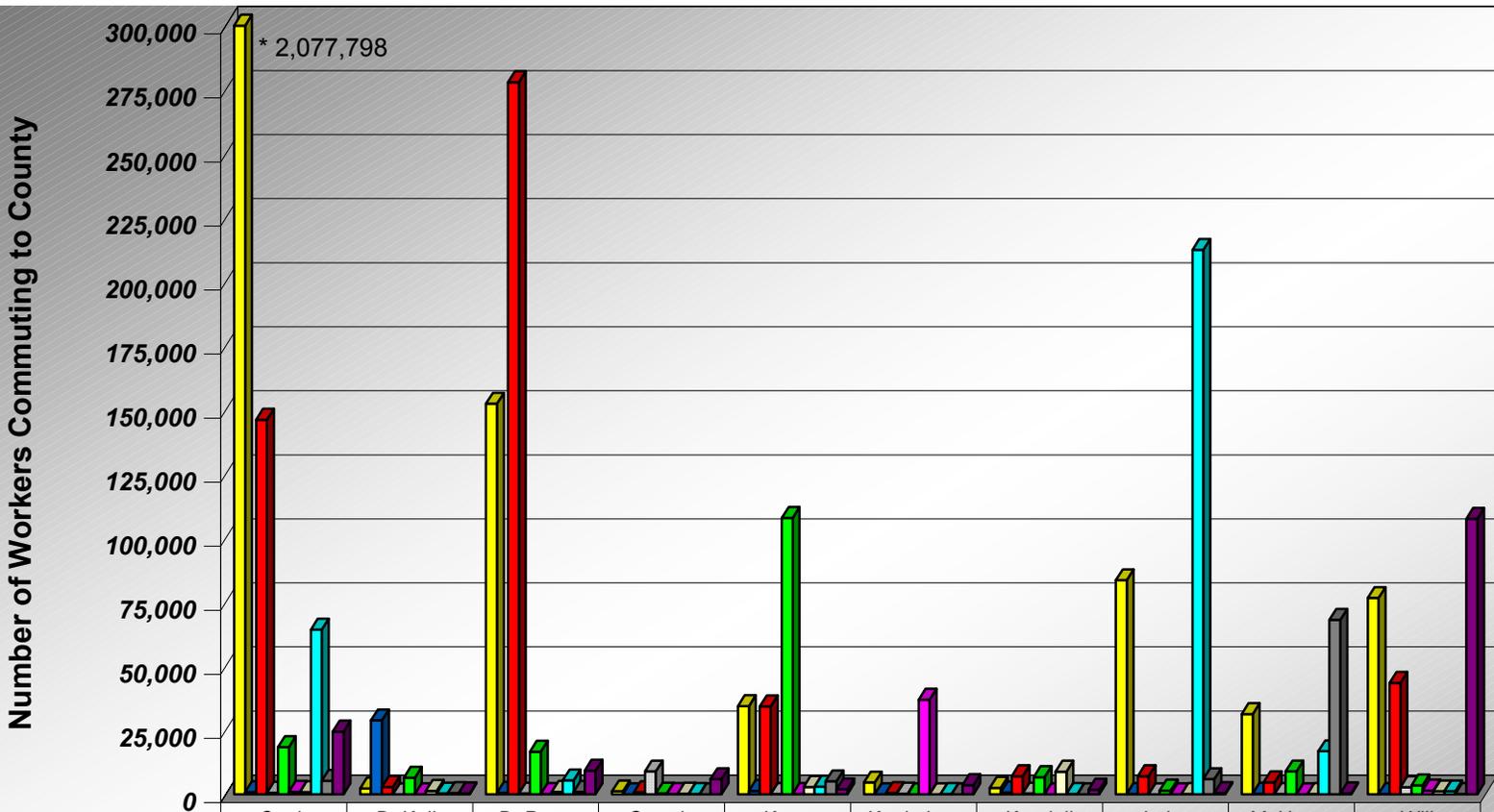
Figure 15

Occupational Employment Projections by County Change from 1998 - 2008



Source Information
 Illinois Department of Employment Security, Labor Market Information,
 Illinois Occupation Long-Term Projections, Labor Economics Database

Figure 16 Where People Reside and Where They Journey to Work Within the Chicago CMSA Counties



	Cook	DeKalb	DuPage	Grundy	Kane	Kankakee	Kendall	Lake	McHenry	Will
■ Cook	2,077,798	2,221	152,433	1,123	34,361	4,559	2,459	83,502	31,337	76,574
■ DeKalb	826	28,811	560	7	1,311	0	725	60	202	149
■ DuPage	146,135	2,857	277,934	765	34,318	471	7,051	6,967	4,650	43,498
■ Grundy	533	19	260	8,884	51	202	299	24	47	2,702
■ Kane	18,345	6,468	16,539	296	107,807	30	6,630	1,383	8,877	3,432
■ Kankakee	977	0	95	98	36	36,936	8	8	0	1,352
■ Kendall	837	1,263	949	180	2,866	12	8,798	64	73	1,097
■ Lake	64,253	249	5,377	68	3,012	63	108	212,450	16,731	1,128
■ McHenry	5,182	448	884	23	5,056	4	20	5,866	68,108	158
■ Will	24,432	349	9,197	5,869	1,840	3,564	1,737	389	343	107,456

Figure 17
Where People Reside and Where They Journey to Work
Within the Metro-East Counties

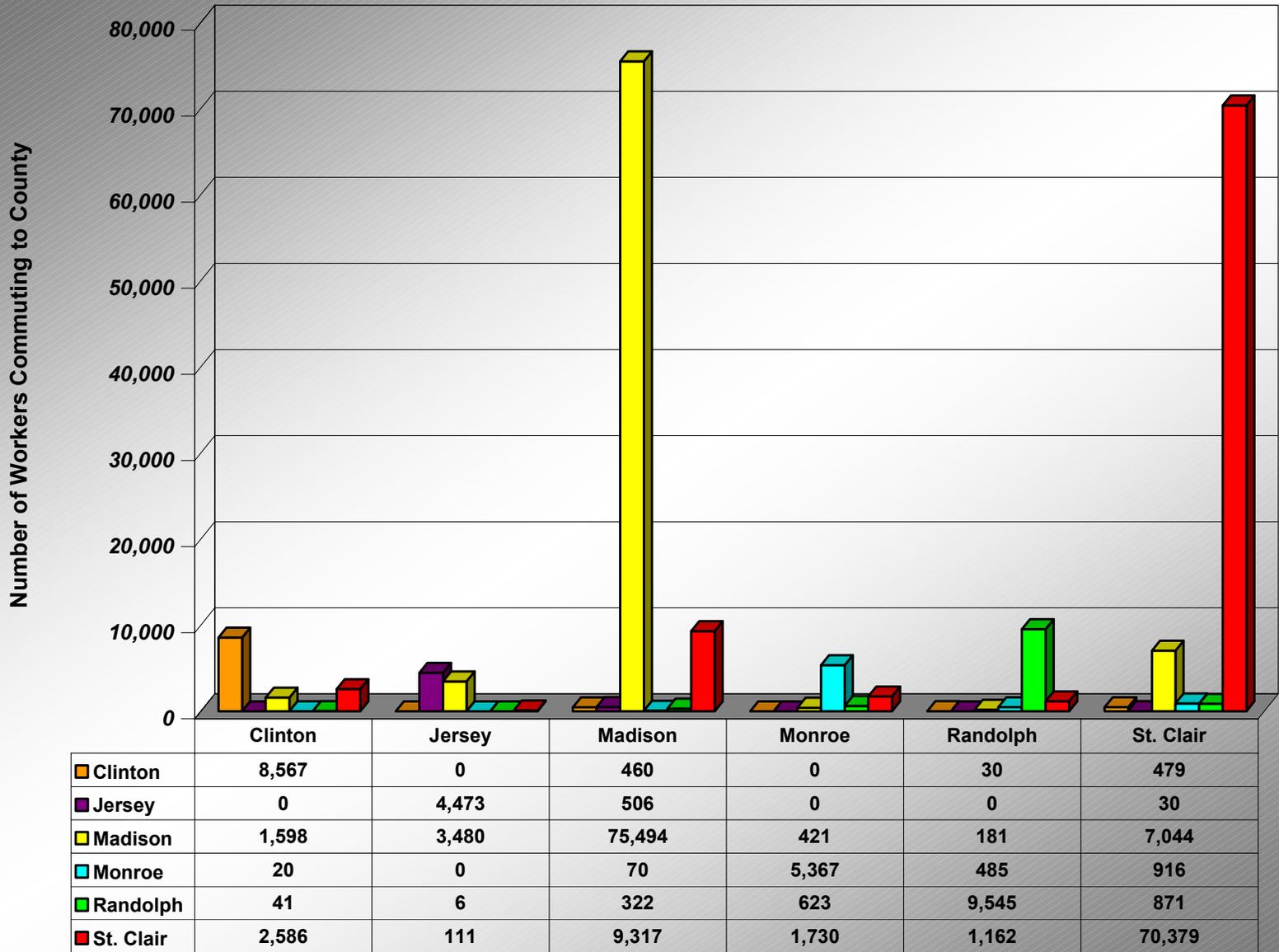


Figure 18

Location of Baldwin Power Plant

